



COMMONWEALTH of VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
***DRAFT PERMIT April 30, 2019***  
TO WITHDRAW GROUNDWATER IN THE  
EASTERN SHORE GROUNDWATER MANAGEMENT AREA

**Permit Number: GW0075700**

Effective Date: XXXXXXXX XX, 2019

Expiration Date: XXXXXXXX XX, 2034

Pursuant to Section 62.1-256 of the Ground Water Management Act of 1992 (Chapter 25, Title 62.1 of the Code of Virginia) and the Groundwater Withdrawal Regulations (Regulations) (9VAC25-610-10 *et seq.*), the State Water Control Board (Board) hereby authorizes the Permittee to withdraw and use groundwater in accordance with this permit.

Permittee Dennis Farm LLC

Facility Dennis Farm

Facility Address 25380 Dennis Road

Parksley, VA 23421

The Permittee's authorized groundwater withdrawal shall not exceed:

16,800,000 gallons per year,  
3,900,000 gallons per month.

The permitted withdrawal will be used to provide an agricultural water supply. Other uses are not authorized by this permit.

The Permittee shall comply with all conditions and requirements of the permit.

By direction of the State Water Control Board, this Permit is granted by:

Signed \_\_\_\_\_

Date \_\_\_\_\_

Director, Office of Water Supply

This permit is based on the Permittee's application submitted on December 15, 2017 and subsequently amended to include supplemental information provided by the Permittee. The following are conditions that govern the system set-up and operation, monitoring, reporting, and recordkeeping pertinent to the Regulations.

## Part I Operating Conditions

### A. Authorized Withdrawal

1. The withdrawal of groundwater shall be limited to the following wells identified in the table below. Withdrawals from wells not included in Table 1 are not authorized by this permit and are therefore prohibited. 9VAC25-610-140.A

**Table 1**

| Owner Well Name* | DEQ Well # | Well Depth (ft) | Screen Intervals | Aquifer**                | Latitude         | Longitude         | Datum |
|------------------|------------|-----------------|------------------|--------------------------|------------------|-------------------|-------|
| Well 1           | 100-01347  | 240             | 220-240          | Middle Yorktown-Eastover | 37° 48' 0.432"   | -75° 37' 55.164"  | WGS84 |
| Well 2           | 100-01348  | 240             | 220-240          | Middle Yorktown-Eastover | 37° 47' 59.208"  | -75° 37' 52.212"  | WGS84 |
| Well 3           | 100-01349  | 240             | 220-240          | Middle Yorktown-Eastover | 37° 47' 57.408"  | -75° 37' 54.12"   | WGS84 |
| Well 4           | 100-01350  | 240             | 220-240          | Middle Yorktown-Eastover | 37° 47' 58.776"  | -75° 37' 55.992"  | WGS84 |
| Well 7           | 100-01353  | 235             | 205-235          | Middle Yorktown-Eastover | 37° 47' 50.478"  | -75° 38' 6.2772"  | WGS84 |
| Well 8           | 100-01354  | 235             | 205-235          | Middle Yorktown-Eastover | 37° 47' 49.9524" | -75° 38' 6.936"   | WGS84 |
| Well 9           | 100-01355  | 235             | 205-235          | Middle Yorktown-Eastover | 37° 47' 49.254"  | -75° 38' 7.8144"  | WGS84 |
| Well 10          | 100-01356  | 235             | 205-235          | Middle Yorktown-Eastover | 37° 47' 48.7248" | -75° 38' 8.4732"  | WGS84 |
| Well 11          | 100-01357  | 230             | 200-230          | Middle Yorktown-Eastover | 37° 47' 54.1212" | -75° 38' 10.8744" | WGS84 |
| Well 12          | 100-01358  | 230             | 200-230          | Middle Yorktown-Eastover | 37° 47' 53.592"  | -75° 38' 11.5296" | WGS84 |
| Well 13          | 100-01359  | 230             | 200-230          | Middle Yorktown-Eastover | 37° 47' 52.890"  | -75° 38' 12.4044" | WGS84 |
| Well 14          | 100-01360  | 230             | 200-230          | Middle Yorktown-Eastover | 37° 47' 52.3572" | -75° 38' 13.0596" | WGS84 |

\*Wells 5 and 6 were originally planned, but never constructed

\*\*Aquifer determinations were based upon designations of aquifer tops made by a DEQ geologist determined from geophysical logs collected during construction of well numbers 7, 10, 11 and 14.

2. Any actions that result in a change to the well operation, construction, or pump intake setting of wells included in this permit must be pre-approved by the Department of Environmental Quality (Department) in writing prior to implementing the change and a revised GW-2 Form must be submitted to the Department within 30 days after the physical construction of a well is altered or the pump intake setting has been changed. If changes are a result of an emergency, notify the Department within 5 days from the change. 9VAC25-610-140.C

### B. Pump Intake Settings

1. The Permittee shall not place a pump or water intake device lower than the top of the uppermost confined aquifer that a well utilizes as a groundwater source or lower than the bottom of an unconfined aquifer that a well utilizes as a groundwater source in order to prevent dewatering of the aquifer, loss of inelastic storage, or damage to the aquifer from compaction. 9VAC25-610-140.A.6

- Pump settings in individual wells are limited as follows. Any change in the pump setting must receive prior approval by the Department.

| Owner Well Name | DEQ Well # | Max Pump Setting<br>(feet below land surface)* |
|-----------------|------------|--|
| Well 1          | 100-01347  | 165  |
| Well 2          | 100-01348  | 165  |
| Well 3          | 100-01349  | 165  |
| Well 4          | 100-01350  | 165  |
| Well 7          | 100-01353  | 165  |
| Well 8          | 100-01354  | 165  |
| Well 9          | 100-01355  | 165  |
| Well 10         | 100-01356  | 165  |
| Well 11         | 100-01357  | 165  |
| Well 12         | 100-01358  | 165  |
| Well 13         | 100-01359  | 165  |
| Well 14         | 100-01360  | 165  |

### C. Reporting

- Water withdrawn from each well shall be recorded consistently at the end of each month and reported to the Office of Water Supply, in paper or electronic format, on a form provided by the Department by the tenth (10<sup>th</sup>) day of each January, April, July and October for the respective previous calendar quarter. Records of water use shall be maintained by the Permittee in accordance with Part III.F, 1 through 5 of this permit. 9VAC25-610-140.A.9
- The Permittee shall report any amount in excess of the permitted withdrawal limit by the fifth (5<sup>th</sup>) day of the month following the month when such a withdrawal occurred. Failure to report may result in compliance or enforcement activities. 9VAC25-610-140.C
- The following is a summary of reporting requirements for specific facility wells:

| Owner Well Name | DEQ Well # | Reporting Requirements |
|-----------------|------------|------------------------|
| Well 1          | 100-01347  | Water Use              |
| Well 2          | 100-01348  | Water Use              |
| Well 3          | 100-01349  | Water Use              |
| Well 4          | 100-01350  | Water Use              |
| Well 7          | 100-01353  | Water Use              |
| Well 8          | 100-01354  | Water Use              |
| Well 9          | 100-01355  | Water Use              |
| Well 10         | 100-01356  | Water Use              |
| Well 11         | 100-01357  | Water Use              |
| Well 12         | 100-01358  | Water Use              |
| Well 13         | 100-01359  | Water Use              |
| Well 14         | 100-01360  | Water Use              |

## **D. Water Conservation and Management Plan**

1. The Water Conservation and Management Plan (WCMP) submitted in the application received December 15, 2017 and subsequently amended and then approved by the Department is incorporated by reference into this permit and shall have the same effect as any condition contained in this permit and may be enforced as such.
2. By the end of the first year of the permit cycle *[date]* the Permittee shall submit a detailed description of their leak detection and repair program activities and documentation to the Department that these activities have been conducted. This documentation shall include frequency of the activities completed and the findings and results of the activities during the first year of the permit term. 9VAC25-610-100.B.1.b, 2.b, or 3.b
3. As soon as completed but not later than the end of the second year of the permit cycle *[date]* the Permittee shall submit to the Department results of a 12 month audit of the total amount of groundwater used in the distribution system and the separate amounts used for drinking and cooling. This audit report shall include the flock cycle start and end dates during the year, and any needed changes to the leak detection and repair program or needed changes to the operations that affected the water use. 9VAC25-610-100.B.1.b, 2.b, or 3.b
4. A report on the plan's effectiveness in maintaining or reducing water use amounts needed, including revisions to those elements of the WCMP that can be improved and addition of other elements found to be effective based on operations to date shall be submitted by the end of years five *[date]* and ten *[date]* of the permit term. These reports shall include as appropriate: 9VAC25-610-140.C
  - a. Any new water saving equipment installed or water saving processes adopted.
  - b. The annual amounts of water used for drinking and cooling from each well or from each poultry house.
  - c. A summary of the operation of the cooling system for the houses such as what dates did the cooling system operation from each year and what months did the cooling system operate.
  - d. Evaluation of the leak detection and repair program with a summary of any significant leaks found and repaired.
  - e. A summary of the flock cycles for each year covered by the report.
5. If revisions or additions to the plan are necessary an updated WCMP shall be submitted to the Department for approval along with the report prior to implementation of the revised plan
6. Records of activities conducted pursuant to the WCMP are to be submitted to DEQ upon request.

## **E. Mitigation Plan**

The Mitigation Plan approved on June 21, 2018 by the Department is incorporated by reference into this permit and shall have the same effect as any condition contained in this permit and may be enforced as such. 9VAC25-610-110.D.3.g

## **F. Well Tags**

1. Each well that is included in this permit shall have affixed to the well casing, in a prominent place, a permanent well identification plate that records, at a minimum, the DEQ well identification number, the groundwater withdrawal permit number, the total depth of the well, and the screened intervals in the well. Such well identification plates shall be in a format specified by the Board and are available from the Department. 9VAC25-610-140.A.12
2. Well tags shall be affixed to the appropriate well casing within 30 days of receiving the tags from the Department. The accompanying well tag installation certification form shall be returned to the Department within 60 days of receipt of the tags. 9VAC25-610-140.C

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## **Part II Special Conditions**

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Pursuant to 9VAC25-610-140.B and C, the following Special Conditions apply to this permit in order to protect the public welfare, safety, and health or conserve, protect and help ensure the beneficial use of groundwater.

### **A. Meter Installation Verification/Correction**

If notified by DEQ through an inspection report that meters meeting the requirements set forth in Part III Condition I of this permit have not been correctly installed on each production well in such a manner as to record total withdrawals from the well including both cooling water and drinking water, the Permittee shall correct any identified meter issues within 60 days of notification.

### **B. Alternative Source Development**

1. By September 30, 2022 the Permittee shall conduct an investigation of the surficial aquifer (Columbia) to evaluate the ability of the surficial aquifer to provide all or part of the water supply needs for the facility. The investigation shall include water quality and pump test data collected from a surficial aquifer test well constructed on-site with Department oversight to ensure the well is properly screened in the surficial aquifer. A geophysical log shall be obtained from the surficial aquifer test well per Part III.K of the permit unless a geophysical log collected from an existing production well is accepted by DEQ as representing the Columbia aquifer at the test well location. An existing well screened in the surficial aquifer located on or near the facility property may be used where approved by DEQ as an alternative. An existing well must have sufficient well construction information available to verify it is screened in the surficial aquifer and properly constructed in order to be considered.
2. A report on the results of the investigation shall be provided to DEQ by March 31, 2023.

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### **Part III**

### **General Conditions**

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#### **A. Duty to Comply**

The Permittee shall comply with all conditions of the permit. Nothing in this permit shall be construed to relieve the permit holder of the duty to comply with all applicable federal and state statutes, regulations and prohibitions. Any permit violation is a violation of the law and is grounds for enforcement action, permit termination, revocation, modification, or denial of a permit application. 9VAC25-610-130.A

#### **B. Duty to Cease or Confine Activity**

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the activity for which a permit has been granted in order to maintain compliance with the conditions of the permit. 9VAC25-610-130.B

#### **C. Duty to Mitigate**

The Permittee shall take all reasonable steps to avoid all adverse impacts that may result from this withdrawal as defined in 9VAC25-610-10 and provide mitigation of the adverse impact when necessary as described in 9VAC25-610-110.D.3.g. 9VAC25-610-130.C

#### **D. Inspection, Entry, and Information Requests**

Upon presentation of credentials, the Permittee shall allow the Board, the Department, or any duly authorized agent of the Board, at reasonable times and under reasonable circumstances, to enter upon the Permittee's property, public or private, and have access to, inspect and copy any records that must be kept as part of the permit conditions, and to inspect any facilities, well(s), water supply system, operations, or practices (including sampling, monitoring and withdrawal) regulated or required under the permit. For the purpose of this section, the time for inspection shall be deemed reasonable during regular business hours. Nothing contained herein shall make an inspection time unreasonable during an emergency. 9VAC25-610-130.D

#### **E. Duty to Provide Information**

The Permittee shall furnish to the Board or Department, within a reasonable time, any information that the Board may request to determine whether cause exists for modifying or revoking, reissuing, or terminating the permit, or to determine compliance with the permit. The Permittee shall also furnish to the Board or Department, upon request, copies of records required to be kept by regulation or this permit. 9VAC25-610-130.E

#### **F. Monitoring and Records Requirements**

1. The Permittee shall maintain a copy of the permit on-site and/or shall make the permit available upon request. 9VAC25-610-130.E

2. Monitoring of parameters shall be conducted according to approved analytical methods as specified in the permit. 9VAC25-610-130.F.1
3. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. 9VAC25-610-130.F.2
4. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart or electronic recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the application for the permit, for a period of at least three years from the date of the expiration of a granted permit. This period may be extended by request of the Board at any time. 9VAC25-610-130.F.3
5. Records of monitoring information shall include as appropriate: 9VAC25-610-130.F.4
  - a. the date, exact place and time of sampling or measurements;
  - b. the name(s) of the individual(s) who performed the sampling or measurements;
  - c. the date the analyses were performed;
  - d. the name(s) of the individual(s) who performed the analyses;
  - e. the analytical techniques or methods supporting the information, such as observations,
  - f. readings, calculations and bench data used;
  - g. the results of such analyses; and
  - h. chain of custody documentation.

## **G. Environmental Laboratory Certification**

The Permittee shall comply with the requirement for certification of laboratories conducting any tests, analyses, measurements, or monitoring required pursuant to the State Water Control Law (§ [62.1-44.2](#) et seq.), Environmental Laboratory Certification Program (§ 2.2-1105 et seq.), Certification for Noncommercial Environmental Laboratories (1VAC30-45), and/or Accreditation for Commercial Environmental Laboratories (1VAC30-46), and

- a. Ensure that all samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
- b. Conduct monitoring according to procedures approved under 40CFR Part 136 or alternative methods approved by the U.S. Environmental Protection Agency.
- c. Periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals that will ensure accuracy of measurements. (1VAC30-45-20)

## **H. Future Permitting Actions**

1. A permit may be modified or revoked as set forth in Part VI of the Regulations. 9VAC25-610-290 and 9VAC25-610-130.G
2. If a Permittee files a request for permit modification or revocation, or files a notification of planned changes, or anticipated noncompliance, the permit terms and conditions shall remain effective until the Board makes a final case decision. This provision shall not be used to extend the expiration date of the effective permit. 9VAC25-610-130.G
3. Permits may be modified or revoked upon the request of the Permittee, or upon Board initiative, to reflect the requirements of any changes in the statutes or regulations. 9VAC25-610-130.G
4. The Permittee shall schedule a meeting with the Department prior to submitting a new, expanded or modified permit application. 9VAC25-610-85
5. A new permit application shall be submitted 270 days prior to the expiration date of this permit, unless permission for a later date has been granted by the Board, to continue a withdrawal greater than or equal to 300,000 gallons in any month while an application for a renewal is being processed. 9VAC25-610-96
6. A new permit application shall be submitted 270 days prior to any proposed modification to this permit that will (i) result in an increase of withdrawal above permitted limits; or (ii) violate the terms and conditions of this permit. 9VAC25610-96
7. The applicant shall provide all information described in 9VAC25-610-94 for any reapplication. 9VAC25-610-96.C
8. The Permittee must notify the Department in writing of any changes to owner and facility contact information within 30 days of the change. 9VAC25-610-140.C

## **I. Metering and Equipment Requirements**

1. Each well and/or impoundment or impoundment system shall have an in-line totalizing flow meter to read gallons, cubic feet, or cubic meters installed prior to beginning the permitted use. Meters shall produce volume determinations within plus or minus 10% of actual flows. 9VAC25-610-140.A.7.b
  - a. A defective meter or other device must be repaired or replaced within 30 days.
  - b. A defective meter is not grounds for not reporting withdrawals. During any period when a meter is defective, generally accepted engineering methods shall be used to estimate withdrawals. The period during which the meter was defective must be clearly identified in the groundwater withdrawal report required by Part I, Subsection D of this permit. An alternative method for determining flow may be approved by the Board on a case-by-case basis.
2. Each well shall be equipped in a manner such that water levels can be measured during pumping and non-pumping periods without dismantling any equipment. Any opening for tape measurement of



water levels shall have an inside diameter of at least 0.5 inches and be sealed by a removable plug or cap. The Permittee shall provide a tap for taking raw water samples from each permitted well. 9VAC25-610-140.A.7.e

## **J. Minor Modifications**

1. A minor modification to this permit must be made to replace an existing well(s) or add an additional well(s) provided that the well(s) is screened in the same aquifer(s) as the existing well(s), and is in the near vicinity of the existing well(s), the total groundwater withdrawal does not increase, the area of impact does not increase, and the well has been approved by the Department prior to construction. 9VAC25-610-330.B.4 and 5
2. A minor modification to this permit must be made to combine withdrawals governed by multiple permits when the systems are physically connected as long as interconnection will not result in additional groundwater withdrawal and the area of impact will not increase. 9VAC25-610-330.B.6
3. Minor modifications to this permit must also be made to:
  - a. Change an interim compliance date up to 120 days from the original compliance date, as long as the change does not interfere with the final compliance date. 9VAC25-610-330.B.7
  - b. Allow for change in ownership when the Board determines no other change in the permit is necessary and the appropriate written agreements are provided in accordance with the transferability of permits and special exceptions. 9VAC25-610-320 and 9VAC25-610-330.B.8
  - c. Revise a Water Conservation and Management Plan to update conservation measures being implemented by the Permittee that increase the amount of groundwater conserved. 9VAC25-610-330.B.9

## **K. Well Construction**

At least 30 days prior to the scheduled construction of any well(s), the Permittee shall notify the Department of the construction timetable and receive prior approval of the well(s) location(s) and acquire the DEQ Well number. All wells shall be constructed in accordance with the following requirements.

1. A well site approval letter or well construction permit must be obtained from the Virginia Department of Health prior to construction of the well. 9VAC25-610-130.A
2. A complete suite of geophysical logs (Spontaneous Potential, Single Point Resistance, 16/64 Short and Long Normal, Natural Gamma) shall be completed for the well and submitted to the Department along with the corresponding completion report. 9VAC25-610-140.C
3. The Permittee shall evaluate the geophysical log and driller's log information to estimate the top of the target aquifer and; therefore, a depth below which the pump shall not be set. The Permittee's determination of the top of the target aquifer shall be submitted to the Department for review and approval, or approved on site by the Department's Groundwater Characterization staff, prior to

installation of any pump. 9VAC25-610-140.A.6

4. The Permittee shall install gravel packs and grout in a manner that prevents leakage between aquifers. Gravel pack shall be terminated close to the top of the well screen(s) and shall not extend above the top of the target aquifer. 9VAC25-610-140.C
5. A completed GW-2 Form and any additional water well construction documents shall be submitted to the Department within 30 days of the completion of any well and prior to the initiation of any withdrawal from the well. 9VAC25-610-140.C. The assigned DEQ Well number shall be included on all well documents. 9VAC25-610-140.C
6. In addition to the above requirements, construction of a Water Level Monitoring State Observation Well (SOW) requires:
  - a. The Permittee shall coordinate activities with the Department's Groundwater Characterization Program (GWCP) to determine the appropriate observation well location and construction schedule, along with the needed screen interval(s), and other completion details following review of geophysical logging. 9VAC25-610-140.C
  - b. Prior to preparation of bid documents for construction of the observation well, the Permittee shall notify the Department and shall include any GWCP requirements in the bid documents. At a minimum, the Department will require a pre-bid meeting with interested drilling contractors and a pre-construction meeting with the successful bidder. 9VAC25-610-140.C
  - c. Instrumentation to meet the requirements for real-time data transmission consistent with the State Observation Well Network shall be purchased by the Permittee. The Permittee shall submit a purchase order based on the Department's equipment specifications for review and approval prior to purchase of the equipment. The Permittee shall not be required to install the equipment. 9VAC25-610-140.C
7. In addition to the above requirements, construction of a Chloride Monitoring SOW requires:
  - a. The Permittee shall coordinate activities with the Department's Groundwater Characterization Program (GWCP) to determine the appropriate observation well location and construction schedule, along with the needed screen interval(s), and other completion details following review of geophysical logging. 9VAC25-610-140.C
  - b. Prior to preparation of bid documents for construction of the observation well, the Permittee shall notify the Department and shall include any GWCP requirements in the bid documents. At a minimum, the Department will require a pre-bid meeting with interested drilling contractors and a pre-construction meeting with the successful bidder. 9VAC25-610-140.C
  - c. Instrumentation to meet the requirements for real-time data transmission consistent with the State Observation Well Network shall be purchased by the Permittee. The Permittee shall submit a purchase order based on the Department's equipment specifications for review and approval prior to purchase of the equipment. The Permittee shall not be required to install the equipment. 9VAC25-610-140.C

- d. Instrumentation to meet the requirements for continuous measurement of specific conductance from multiple levels within the well screen shall be purchased by the Permittee. The Permittee shall submit a purchase order based on the Department's equipment specifications for review and approval prior to purchase of the equipment. The Permittee shall not be required to install the equipment. 9VAC25-610-140.C

## **L. Permit Reopening**

This permit may be reopened for the purpose of modifying the conditions of the permit as follows:

- a. To meet new regulatory standards duly adopted by the Board. 9VAC25-610-140.A.11
- b. When new information becomes available about the permitted withdrawal, or the impact of the withdrawal, which had not been available at permit issuance and would have justified the application of different conditions at the time of issuance. 9VAC25-610-310.B.1
- c. When the reported withdrawal is less than 60% of the permitted withdrawal amount for a five year period. 9VAC25-610-310.B.2
- d. If monitoring information indicates the potential for adverse impacts to groundwater quality or level due to this withdrawal. 9VAC25-610-140.C

**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**PERMIT ISSUANCE FACT SHEET**

Groundwater Withdrawal Permit Number: GW0075700

Application Date: December 15, 2017

The Department of Environmental Quality (Department or DEQ) has reviewed the application for a Groundwater Withdrawal Permit. Based on the information provided in the application and subsequent revisions, DEQ has determined that there is a reasonable assurance that the activity authorized by the permit is a beneficial use as defined by the regulations. Groundwater impacts have been minimized to the maximum extent practicable. The following details the application review process and summarizes relevant information for developing the Permit and applicable conditions.

**Permittee / Legal Responsible Party**

Name & Address: Dennis Farm LLC  
4629 Nassawango Road  
Snow Hill, MD 21863  
Phone: (757) 894-3831

**Facility Name and Address**

Name & Address: Dennis Farm  
25380 Dennis Road  
Parksley, VA 23421  
Phone: (757) 894-3831

**Contact Information:**

Name: Iqbal Mohammad  
E-mail: cottonwoodranch@gmail.com  
Phone: (757) 894-3831

**Proposed Beneficial Use:**

The proposed use for this withdrawal is for agriculture. Withdrawals will supply a poultry growing operation with water for cooling of chicken houses as well as for direct consumption by poultry.

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**Processing Dates**

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| <b>Processing Action</b>                                 | <b>Date Occurred/Received</b> |
|--|-------------------------------|
| Pre-Application Meeting:                                 | September 7, 2017             |
| Application Received:                                    | December 15, 2017             |
| Permit Fee Deposited by Accounting:                      | Not Applicable                |
| Notice of Deficiency Sent                                | February 22, 2018             |
| Response to Notice of Deficiency Received:               | April 4, 2018                 |
| Request for Additional Information Sent:                 | April 16, 2018                |
| Response to Request for Additional Information Received: | May 3, 2018                   |
| Local Government Ordinance Form Received:                | May 3, 2018                   |
| Application Complete:                                    | June 21, 2018                 |
| Submit Request for Technical Evaluation:                 | December 18, 2018             |
| Technical Evaluation Received:                           | February 13, 2019             |
| Draft Permit Package Sent:                               | April 30, 2019                |
| Submit Draft Permit for Public Notice:                   | TBD                           |
| Public Notice Published:                                 | TBD                           |
| End of 30-Day Public Comment Period:                     | TBD                           |
| Response to Public comment:                              | TBD                           |
| Public Meeting or Hearing:                               | TBD                           |

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**Application**

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**Application Information**

Dennis Farm is a poultry farm owned by Dennis Farm LLC and located in Accomack County. Dennis Farm has fourteen existing poultry houses and twelve production wells. Four of the production wells provide water to six poultry houses that have existed since early 2006. The six original houses are 46 feet wide by 560 feet long. The remaining eight production wells were constructed in early 2018 to supply water to the eight newer poultry houses, which were constructed later during 2018. The eight newer poultry houses are each 61 feet wide by 560 feet long. The eight new wells were installed and geophysical data were collected under the guidance of Department staff. The farm produces broilers. Additional information on how water is used at the farm is discussed in the basis of need section of the fact sheet.

**Location of Facility/Withdrawal:**

Water Supply Planning Unit: Accomack & Northampton

County: Accomack County

GWMA/Aquifer: Eastern Shore/Middle Yorktown-Eastover

Conjunctive Use Source: This system uses no surface water and is therefore not a conjunctive use system.

### **Withdrawal Use, Current Need, and Projected Demand:**

#### Basis of Need:

Poultry farms use groundwater to provide drinking water to the birds as well as to supply water to either misting systems or evaporative cooling pads designed to regulate temperatures in the house and keep the birds cool. Cooling is primarily required in summer.

Water use for poultry farms varies seasonally as well as in response to the poultry life cycle. Generally during winter, fall, and spring, facility withdrawals rise and fall in a predictable pattern every 50-60 days, or the length of time it takes to raise a flock, with increased usage primarily resulting from increased water consumption as the birds gain weight. This water use pattern starts with low water consumption volumes for chick development and peaks in the last 20-30 days as growers seek to maximize adult weight gains. Typically, farms raise around five flocks per year with this cycle repeating each time. During the summer, withdrawal volumes increase due to additional water usage for flock cooling purposes.

Water volumes used for consumption are controlled by a computer system that provides water to the drinker system, which provides access to water for the birds but limits spillage or excess moisture from entering the house. Avoiding excess moisture is critical to bird health and as a result careful conservation of water is already a key tenet of management in a broiler house. The computer tracks water supplied to the drinking system and records the volume. This data was maintained by some farms but in many cases was not recorded long-term. Where available, data from the computer is discussed in the historic withdrawals section of the factsheet.

The cooling systems are operated based on temperature and humidity and while usage is typically restricted to summers, operation of the cooling systems tends to vary between farms. Historically, water supplied to the cooling systems was not metered so very limited data is available on usage.

Water Demand Projection: Water demands are based on estimated drinking and cooling water amounts needed to supply all the system houses. Proposed withdrawal limits were calculated based on the total of consumption by poultry (drinking water) and cooling. Water use for consumption was calculated based on flock size per house, the number of flocks raised per house per year (5.5), and an estimate of average water use per bird per based on water use metered at the six original poultry houses. The six older, original houses contain 29,700 birds per flock and the eight larger houses each contain 37,500 birds per flock. The application stated that 112,617 gallons were metered via a computer controller at the older houses for production of a single flock, producing a ratio of 3.79 gallons per bird per flock. Assuming the same ratio to produce flocks at the larger houses (and 5.5 flocks per year at all houses), the maximum annual demand was estimated to equal 9,972,860 gallons per year (see Attachment 1). The monthly demand was based on the amount needed during the last 31 days of growth when the birds drink the most water.

As no data on volumes used for cooling was available from farms operating on the shore, a procedure for estimating water use for cooling was developed for use based on discussions with industry stakeholders, individual farmers, and a review of available literature. House size and

cooling fan capacity were identified as the major variables determining water use for cooling poultry houses. A formula based on 1.6 gallons per year per cubic foot per minute (cfm) of cooling fan capacity was determined to be representative for the Delmarva area poultry industry. The major variable for cooling fan capacity is the width of the house as that provides for the number and size of cooling fans that can be installed. The combined total width of the houses for the facility was used as the basis to estimate cooling water use. This relation produced an estimate of 4,286,400 cfm for the farm, yielding a total annual cooling demand of 6,858,240 gallons per year, and 2,286,080 gallons per month for each of the three months during which cooling is expected to be required. The water use calculations are attached to the fact sheet (see Attachment 1). The permit requires metering of the wells to record total water use and actual amounts used for cooling will be collected.

A small amount of water is used for general farm operation including washing equipment and cleaning houses between flocks. The applicant estimated this volume as insignificant at less than 300 gallons per month and it was not included in the demand estimate. The annual and monthly demand estimates for consumption and cooling described above were each summed and rounded to produce the requested annual and monthly requested withdrawal limits for the facility.

Water demands are not expected to change as the amount requested represents the maximum capacity of the farm and no additional houses are considered in this permit. Therefore, no future projections are included for this facility.

Withdrawal Volumes Requested: The applicant requested the following withdrawal volumes based upon the projected groundwater demand.

| <b>Period of<br/>Withdrawal</b> | <b>Actual Volume (gal.)</b> | <b>Volume in<br/>MGD</b> |
|---------------------------------|-----------------------------|--------------------------|
| Maximum Monthly:                | 3,850,000                   | 0.126                    |
| Maximum Annual:                 | 16,831,000                  | 0.046                    |

## **DEQ Evaluation**

### **Historic Withdrawals:**

Records of withdrawals collected from the older poultry houses were used to estimate consumption demand. Refer to the Water Demand Projection section for more information on how water use was estimated.

Analysis of Alternative Water Supplies: The Eastern Shore of Virginia is an area primarily served by groundwater with the majority of withdrawals coming from the three confined Yorktown-Eastover (Upper/Middle/Lower) aquifers. There is limited surface water availability with the majority of streams being too small to supply sufficient water for most purposes, larger water bodies are typically tidally influenced, and water quality concerns have limited the development of these sources. Withdrawals from the surficial aquifer, or water table, are one viable alternative to withdrawals from the confined system. While withdrawals from the surficial aquifer can present additional water quality challenges in the form of iron forming bacteria and increased vulnerability to surface contaminants, it may be viable in some locations where capacity and quality are

sufficient. In general, drinking water for poultry must be of higher quality than the cooling water. In most cases, site-specific data will be necessary to determine the viability of the surficial aquifer and to determine what portions of the use it can supply.

Public Water Supply: The proposed withdrawal does not contain a public water supply component.

Water Supply Plan Review: A Water Supply Planner coordination request was sent on September 10, 2018 and a response was received on January 9, 2019. The response noted several key items.

The Accomack County Regional Water Supply Plan (Plan) includes irrigating agricultural facilities using both groundwater and surface water, with current permitted amounts sufficient to meet demands into 2040. The plan, however, does not include existing poultry farms in their assessments. While the seafood industry could also show future growth in the region, Section 4.0 of the ANPDC Groundwater Management Plan details industrial water for seafood and poultry processing, noting over 90% of industrial groundwater usage is related to poultry processing. WSP Staff note existing water quality concerns for surface waters and no significant water surpluses or sources in Accomack County to serve as alternative sources. Additionally, WSP staff reviewed the current alternatives under consideration, such as water table wells, and noted that the ability of the National Resources Conservation Service's (NRCS) Environmental Quality Incentives Program (EQIP) program to fund such efforts is currently unknown. The current lack of inclusion of poultry in the region's plan, existing water quality and alternative source concerns, and the unknown status of funding for alternative development underlines potential regional resource concerns to be addressed in future planning efforts.

DEQ Recommended Withdrawal Limits: The recommended withdrawal limits are based on the total of both consumption (drinking water) and cooling. Water use for consumption was evaluated based on metered computer controller data from the six original poultry houses at the farm. The consumption rate estimate provided with the application was reviewed and DEQ staff determined that it provided a reasonable basis for estimating monthly and annual consumption for the facility. DEQ staff also evaluated the water use calculations from other farms and determined the volumes included in the application provided reasonable estimates of annual and monthly withdrawal amounts for this size facility.

DEQ staff evaluated the volumes requested for cooling and determined they were accurately calculated using the procedure discussed in more detail above. Given the lack of data available for evaluating poultry water use, DEQ believes the methods employed are conservative enough to provide sufficient water for the farm to continue operation while still providing a reasonable limit for the permits. It is expected that as more metered data becomes available, withdrawal limits may be reduced in cases where actual water use is significantly lower than the permit limits.

Withdrawal limits were rounded to nearest hundred thousand in accordance with DEQ's April 6, 2015 "Rounding Memo". DEQ recommends the following withdrawal volumes based upon evaluation of the groundwater withdrawal permit application.

| Period of | Actual Volume (gal.) | Volume in |
|-----------|----------------------|-----------|
|-----------|----------------------|-----------|



| <b>Withdrawal</b> |            | <b>MGD</b> |
|-------------------|------------|------------|
| Maximum Monthly:  | 3,900,000  | 0.126      |
| Maximum Annual:   | 16,800,000 | 0.046      |

### Technical Evaluation:

Aquaveo, LLC performed a technical evaluation of the application for the Department based on the VAHydroGW-ES model. As an aquifer pump test was not performed, the properties from the VAHydroGW-ES model were used to simulate the potential drawdown resulting from the proposed withdrawal. The model uses a base simulation which includes all existing permits (except the applicant wells) operating at their 2017 maximum annual withdrawal limit allowed under the terms of their permit for all Ground Water Management Area (GWMA) permit holders. This base simulation was executed for a simulation period representing 50 years. A second 50-year simulation was then conducted using the VAHydroGW-ES model with the applicant's proposed withdrawals added to the base simulation to simulate drawdown resulting from the applicant's wells using the proposed withdrawal volumes. The objectives of this evaluation were to determine the areas of any aquifers that will experience at least one foot of water level decline due to the proposed withdrawal (the Area of Impact or AOI), to determine the potential for the proposed withdrawal to cause salt-water intrusion, and to determine if the proposed withdrawal meets the 80% drawdown criteria. A summary of the results of the evaluation are provided below and the full technical evaluation is attached to this fact sheet as Attachment 2.

Aquaveo, LLC reviewed and compared simulated 2017 water levels from the VAHydroGW-ES model reported use simulation to USGS measured water levels in observation wells closest to the applicant's withdrawal for the same year for the Upper, Middle, and Lower Yorktown-Eastover aquifers. Comparing the VAHydroGW-ES 2017 Historic Use Water Level with the USGS Network Well 2017 measured water levels provides a method for judging the accuracy of the VAHydroGW-ES model. They noted that the water levels obtained from the regional observation networks for the Upper, Middle, and Lower Yorktown-Eastover aquifers were generally similar to those recorded in three network wells located approximately four to six miles away. Aquaveo also noted that the observed water levels in all three aquifers exhibit yearly fluctuations in water levels of approximately 2 to 5 ft in the Upper Yorktown-Eastover aquifer and 2 to 10 ft in the Middle and Lower Yorktown-Eastover aquifers. Water levels simulated by the VAHydroGW-ES do not fluctuate in the same manner because the pumping and recharge simulated in the model for any given year are averaged over the year and entered in the model as the average value for the year. Aquaveo concluded that while there are some variations between the observed and simulated water levels, the fluctuations and general patterns observed in the USGS wells are simulated by the VAHydroGW-ES model and the water levels from the two sources are in general agreement. Differences between observed and simulated water levels will be noted and addressed during the next calibration of the VAHydroGW-ES model.

The potential for adverse changes to water quality due to increases salinity resulting from the proposed withdrawal was evaluated using transient, density-dependent, SEAWAT simulations using the VAHydroGW-ES. The results indicated that no model cells simulate an increase in chloride concentration greater than 55 mg/L due to the proposed withdrawal. Therefore, the VAHydroGW-ES model results do not indicate the potential for reduced water quality.

The results of the VAHydroGW-ES simulations predict areas of impact due to the proposed withdrawal in the Middle and Lower Yorktown-Eastover aquifers. The Area of Impact (AOI), or the area in which the withdrawal is expected to result in a drawdown of at least 1 foot, extend a maximum distance of approximately 0.6 miles from the production center in the Middle Yorktown-Eastover aquifer, and approximately 0.4 miles from the production center in the Lower Yorktown-Eastover aquifer. As the AOI extends off of the property line, a mitigation plan was required to be incorporated into the permit. The modeled area of impact determines the area for which the facility must mitigate any impacts according to the mitigation plan incorporated into this permit.

With the inclusion of the proposed withdrawal, the model simulated water levels at 11.0, 5.6, and 5.9 feet msl for the Upper, Middle, and Lower Yorktown-Eastover aquifers, respectively. The 80% drawdown criterion allows the potentiometric water level (based on the critical surface elevation calculated from the VAHydroGW-ES data) to be reduced to -74.7, -105.7, and -163.5 feet msl for the Upper, Middle, and Lower Yorktown-Eastover aquifers, respectively. Therefore, the water levels in the VAHydroGW-ES cell containing the applicant wells for each confined aquifer are not simulated to fall below the critical surface. Additionally, no new VAHydroGW-ES cells are simulated to have water levels fall below the critical surface. Therefore, this withdrawal is within the limits set by the 80% drawdown criterion.

Aquaveo, LLC concluded that the proposed withdrawals meet the technical criteria for permit issuance. Maps of the AOIs are included in the attached Mitigation Plan (Attachment 3).

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### Part I Operating Conditions

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#### Authorized Withdrawals:

| Owner Well Name* | DEQ Well #* | Aquifer**                | Type       | Max Pump Setting<br>(ft. bls)** |
|------------------|-------------|--------------------------|------------|---------------------------------|
| Well 1           | 100-01347   | Middle Yorktown-Eastover | Production | 165                             |
| Well 2           | 100-01348   | Middle Yorktown-Eastover | Production | 165                             |
| Well 3           | 100-01349   | Middle Yorktown-Eastover | Production | 165                             |
| Well 4           | 100-01350   | Middle Yorktown-Eastover | Production | 165                             |
| Well 7           | 100-01353   | Middle Yorktown-Eastover | Production | 165                             |
| Well 8           | 100-01354   | Middle Yorktown-Eastover | Production | 165                             |
| Well 9           | 100-01355   | Middle Yorktown-Eastover | Production | 165                             |
| Well 10          | 100-01356   | Middle Yorktown-Eastover | Production | 165                             |
| Well 11          | 100-01357   | Middle Yorktown-Eastover | Production | 165                             |
| Well 12          | 100-01358   | Middle Yorktown-Eastover | Production | 165                             |
| Well 13          | 100-01359   | Middle Yorktown-Eastover | Production | 165                             |
| Well 14          | 100-01360   | Middle Yorktown-Eastover | Production | 165                             |

\*Wells 5 and 6 were originally planned, but never constructed

\*\*Aquifer determinations and maximum pump settings were based upon designations of aquifer tops made by a DEQ geologist determined from geophysical logs collected during construction of wells 7, 10, 11 and 14.

**Apportionment:** Apportionment of withdrawals is expected to be fairly equally spread across all facility wells and the permit does not include apportionment limits.

**Additional Wells:**

Observation Wells: No observation wells

Abandoned Wells: No abandoned wells

Out of Service Wells: No out of service wells

**Pump Intake Settings:**

Information regarding pump intake settings was in the well completion reports (GW-2 forms) submitted with the application materials. The pump intakes for well numbers 1 through 4 are 100 ft bls; and the intakes for well numbers 7 through 14 were set at 125 ft bls.

All well pumps are correctly positioned in accordance with 9VAC25-610-140(A)(6).

**Withdrawal Reporting:** Groundwater withdrawals are to be recorded monthly and reported quarterly.

**Water Conservation and Management Plan:**

A Water Conservation and Management Plan (WCMP) meeting the requirements of 9VAC25-610-100.B was submitted and reviewed as part of the application process. The accepted Plan (see Attachment 4) is to be followed by the permittee as an operational Plan for the facility/water system.

- A detailed description of the leak detection and repair program activities and documentation to the Department that these activities have been conducted is due by the end of the first year of the permit term (*date*).
- A result of a 12-month audit of the total amount of groundwater used in the distribution system and the amounts for drinking and cooling water, documentation of the flock cycle start and end dates, and any needed changes to the operational affecting water use is due by the end of the second year of the permit term (*date*).
- A report on the plan's effectiveness in maintaining or reducing water use amounts needed, including revisions to those elements of the WCMP that can be improved and addition of other elements found to be effective based on operations to date shall be submitted by the end of years five [*date*] and ten [*date*] of the permit term.

**Mitigation Plan:** The predicted AOI resulting from the Technical Evaluation extends beyond the property boundaries in the Middle Yorktown-Eastover and Lower Yorktown-Eastover aquifers. Given this prediction, a Mitigation Plan to address potential claims from existing well owners within the predicted area of impact is included in the permit by reference (see Attachment 3).

**Well Tags:** Well tags will be transmitted with the final permit.

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## Part II Special Conditions

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**Meter Installation/Verification:** Each well is metered in the central well house. Consumption is metered through the consumption waterers as well and the cooling load per house can be determined from the difference of these two meters. In cases where meters are found to be incorrectly installed or otherwise failing to capture the total water use of each well, DEQ will notify the permittee of such via an inspection report and the permittee shall correct any meter issues within 60 days.

**Alternative Source Development:** The facility is supplied by wells screened in the confined Yorktown-Eastover aquifer system. The confined aquifer system on the eastern shore is considered to be of higher quality than the surficial (water table) aquifer and is the potable water supply for the Eastern Shore. The regulation requires the lowest quality water available be applied to the permitted use. While the application states generally that the surficial aquifer would not be viable, site specific investigation is necessary to evaluate the surficial aquifer quality and availability. By September 30, 2022, an alternative source investigation must be completed and the results submitted to DEQ by March 31, 2023 for review and acceptance. The investigation shall provide pump test and water quality data from a test or production well screened in the surficial aquifer on the facility site as well as conclusions on the capability of the surficial aquifer to supply all or part of the water needs for the facility.

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## Part III General Conditions

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General Conditions are applied to all Groundwater Withdrawal Permits, as stated in the Groundwater Withdrawal Regulations, 9VAC25-610-10 *et seq.*

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## Public Comment

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### **Relevant Regulatory Agency Comments:**

Summary of VDH Comments and Actions: This facility is not a public water supply so soliciting comments from VDH was not required.

### **Public Involvement during Application Process:**

Local and Area wide Planning Requirements: The Accomack County Administrator indicated on April 24, 2018 that the facility's operations are consistent with all adopted ordinances.

Public Comment/Meetings: The public notice was published in the Eastern Shore Post on May 23, 2019. The public comment period ran from May 24, 2019 to July 12, 2019.

## Changes in Permit Part II Due to Public Comments

## Changes in Permit Part III Due to Public Comments

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### Staff Findings and Recommendations

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Based on review of the permit application, staff provides the following findings.

- The proposed activity is consistent with the provisions of the Ground Water Management Act of 1992, and will protect other beneficial uses.
- The proposed permit addresses minimization of the amount of groundwater needed to provide the intended beneficial use.
- The effect of the impact will not cause or contribute to significant impairment of state waters.
- This permit includes a plan to mitigate adverse impacts on existing groundwater users.

Staff recommends Groundwater Withdrawal Permit Number GW0075700 be issued as proposed.

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### Attachments

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1. **Water Use Calculation Worksheet**
2. **Technical Evaluation**
3. **Mitigation Plan**
4. **Water Conservation Plan**
5. **Public Comment Sheet**

Approved: \_\_\_\_\_

Director, Office of Water Supply

Date: \_\_\_\_\_

# **ATTACHMENT 1**

## **DRAFT FACT SHEET**

### **WATER USE CALCULATION WORKSHEET**

Dennis Farms GW0075700 14 Houses- 6- 560' X 46' flock size 29,700 broilers per house  
8- 560' X 61' flock size 37,500 broilers per house

## Section-2 Facility Information

VPA # General Permit no. VPG250059

## Section-4 Type of application

New/ Expanded

## Section-8

### System over view

14 houses 6-560' X 46 are in production 8-560'X 61' are complete awaiting flocks

### Beneficial use

Dennis Farms was constructed in 2006 under different ownership. Houses 1, -6 Houses 7-14 where constructed 2017-2018 and has not started production

The farm consists of 14 Houses housing 29,700 birds per house in houses 1-6, 37,500 birds per house in houses 7-14 total 478,200 birds per flock 5.5 flocks per year.

Wells in houses 1-6 are piped to 1 of two central well houses were they are metered as they come in from the well and pressure switches control each pump. Pumps run on 40# on and 60# off pressure switches. After the pressure switches they run into a manifold system and are distributed through each of three houses. ( These configuration can be tuned to run off of 1 well only, but current configuration is two wells on run three houses )

Wells in Houses 7-14 are piped from wells to one of two well houses central between four poultry houses, they are metered as they enter and are controlled by pressure switches. Each well is designated to a poultry house. Consumption metering is done at the individual houses through PLC. House meter - PLC meter = cooling meter reading

Equipment usage will be 15 tunnel fans for each house with a total house CFM of 364,000 for houses 7-14 and 15 tunnel fans in houses 1-6 228,000 CFM and farm CFM of 4,268,400X 1.6 gallons and annual cooling load of 6,858,240 Monthly cooling load of 6,858,240/ 3 =2,286,080 Recirculating evaporative cooling pads will be optimized with back up foggers. Nipple waters will be utilized

Calculations for consumption are as follows

3.79 gallons per bird has been established as the consumption rate from the active Dennis Farm in Parksley Va. 112,617 gallons / 29,700 flock size = 3.791818 gallons per bird over a 50 day life cycle. 20-50 day metered consumption is 97,141 gallons / 29,700 flock size =3.270741 gallons per bird for maximum month flock consumption.

Houses 1-6: 29,700 flock size per house X 6 houses =178,200 birds X 3.791818 = 675,702 gallons a flock X 5.5 flocks = annual flock consumption 3,716,361 gallons  
Houses 7-14 37,500 flock size per house X 8 houses = 300,000 birds X 3.791818 = 1,137,545 gallons a flock X 5.5 flocks= annual flock consumption 6,256,500 gallons  
total annual flock consumption 9,972,860 gallons

Calculations for Maximum consumption are as follows

From Dennis farms Metering 97,141 gallons metered days 20-50 / 29,700 flock size = 3.270741 Gallons per bird over the maximum usage day 20-50.

20-50 day metered consumption is 97,141 gallons / 29,700 flock size =3.270741 gallons per bird for maximum month flock consumption.

Houses 1-6: 29,700 flock size per house X 6 houses =178,200 birds X 3.270741 = 981,222 gallons for maximum month consumption  
Houses 7-14 37,500 flock size per house X 8 houses = 300,000 birds X 3.270741 = 582,846 gallons for maximum month consumption  
total Maximum consumption 1,564,068

See all calculations below.

|                               | Dennis Farms            | 14 Houses  |                          |           |           |           |         |
|-------------------------------|-------------------------|------------|--------------------------|-----------|-----------|-----------|---------|
| Annual Flock Consumption      | 6 houses @ 112,616      | 1,813,247  | Gal                      | X 5.5     | Flock     | 9,972,860 | Gallons |
|                               | 8 houses @ 142,193      |            | Flock                    |           | Year      |           | Year    |
| Max monthly Flock Consumption | 97,141 X 6 hse=582,846  | Day 20     | Daily water consumption= |           |           | 1,564,068 | Gal     |
| Day 20-day 50                 | 122,652 X 8 hse=981,222 | Day 50     |                          |           |           |           | Month   |
| Tunnel Fan Capacity=          | 8 houses @ 364,800      | cfm        | X 8 total                | 2,918,400 | 4,286,400 |           |         |
|                               | 6 houses @ 228,000      | house      | X 6 houses               | 1,368,000 | 4,286,400 |           |         |
|                               |                         |            |                          | CFM       |           |           |         |
| Annual Cooling =              | 4,268,400               | 1.6 Gal yr | =                        | 6,858,240 | gal       |           |         |
|                               |                         | 1 cfm      |                          |           | yr        |           |         |

Dennis Farms    GW0075700    14 Houses- 6- 560' X 46'    flock size 29,700 broilers per house  
8- 560' X 61'    flock size 37,500 broilers per house

Requested Withdraw Amounts

|                           |            |                 |   |                  |            |            |            |                        |
|---------------------------|------------|-----------------|---|------------------|------------|------------|------------|------------------------|
| Annual Amount =9,972,860  | <u>gal</u> | ( consumption ) | + | 6,858,240        | <u>gal</u> | (cooling)= | 16,831,000 | <u>gal</u>             |
|                           | yr         |                 |   |                  | yr         |            |            | yr                     |
| Monthly Amount =1,564,068 | <u>gal</u> | ( consumption ) | + | <u>6,858,240</u> |            | cooling =  | 2,286,080  | = 3,850,148 <u>gal</u> |
|                           | mo         |                 |   | 3                |            |            |            | mo                     |
| Annual amount Requested   |            |                 |   | 16,831,000       | gal/yr     |            |            |                        |
| Monthly amount Requested  |            |                 |   | 3,850,000        | gal/mo     |            |            |                        |

6 original Houses were built in 2005-2006

8 Houses where added in 2017-2018 and are awaiting flocks

Flock total for Both sets of houses is 478,200 broilers 5.5 flocks are expected each year

The Attached Drawing shows Houses and well Locations. One well per house and well is metered in one of two central well houses, Wells are separated in the row of the well houses. Consumption is metered through the consumption waterers also. House meter-consumption meter will giving cooling load per house.

Water usage for maintenance/cleaning will come from the individual house and be metered there. The total cleaning Maintenance volume should be less than 300 gallons per month and that being said should be insignificant.

Only broilers are planned at this stage

Section-9 Alternatives Analysis

Other Water that may be available would be the Columbia Aquifer at shallower depths, water quality may be lower requiring some type of treatment,

There are surface waters ( Sediment pond onsite)

Section-10 Water conservation And Management plan

See attached

Section-11 Wastewater treatment and disposal

General permit no. VPG250059

Section-12 Well Locations

See attached drawings with site plan, Well Locations and USGS top map

Section-13 Existing Well Information

Wells 5 and 6 were never drilled. As this portion of the farm was developed by a previous farmer. We have come to understand it was permitted and never drilled as a saving.

Note: Well construction is complete see attached completion reports



# **ATTACHMENT 2**

## **DRAFT FACT SHEET**

### **TECHNICAL EVALUATION**

**COMMONWEALTH of VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**TECHNICAL EVALUATION FOR PROPOSED GROUNDWATER WITHDRAWAL**

**Date:** December 14, 2018

**Application /Permit Number:** GW0075700

**Owner / Applicant Name:** Dennis Farm, LLC

**Facility / System Name:** Dennis Farm

**Facility Type:** Agriculture – Poultry Farm

**Facility / System Location:** Accomack County

The Commonwealth of Virginia’s Groundwater Withdrawal Regulations (9VAC25-610-110(D) state that, for a permit to be issued for a new withdrawal, to expand an existing withdrawal, or reapply for a current withdrawal, a technical evaluation shall be conducted. This report documents the results of the technical evaluation conducted to meet the requirements for the issuance of a permit to withdrawal groundwater within a Groundwater Management Area as defined in (9VAC25-600-10 et seq.).

This evaluation determines the:

- (1) The Area of Impact (AOI): The AOI for an aquifer is the areal extent of each aquifer where one foot or more of drawdown is predicted to occur as a result of the proposed withdrawal.
- (2) Water Quality: The potential for the proposed withdrawal to cause salt water intrusion into any portions of any aquifers or the movement of waters of lower quality to areas where such movement would result in adverse impacts on existing groundwater users or the groundwater resource as per (9VAC25-610-110(D)(2), and
- (3) The Eighty Percent Drawdown (80% Drawdown): The proposed withdrawal in combination with all existing lawful withdrawals will not lower water levels, in any confined aquifer that the withdrawal impacts, below a point that represents 80% of the distance between the land surface and the top of the aquifer at the points where the one-foot drawdown contour is predicted for the proposed withdrawal as per 9VAC25-610-110(D)(3)(h).

**Summary of Requested Withdrawal:**

General:

In response to the Department of Environmental Quality’s (DEQ) Compliance Assistance Framework initiative, a cohort of poultry farms in Accomack County were identified as potentially requiring a groundwater withdrawal permit (GWWP). The farms primarily grow broilers which are processed by several poultry integrators located in the area. These farms use groundwater to provide drinking water to the birds as well as to supply water to either misting systems or evaporative cooling pads which cool the birds. Cooling is primarily required in summer. Most wells associated with poultry farms in Accomack County are screened in either the upper, middle, or lower Yorktown-Eastover aquifers. The use of the Columbia (water-table) aquifer is being investigated by the industry and this aquifer may be used in the future to augment withdrawals from confined aquifers where possible.

Water use for poultry farms varies seasonally as well as in response to the poultry life cycle. Generally during winter, fall, and spring, facility withdrawals rise and fall in a fairly predictable pattern every 50-60 days, with usage primarily resulting from water consumption. This pattern starts with low water

consumption volumes for chick development and maxes out in the last 20-30 days as breeders seek to maximize adult weight gains. Typically, farms raise around five flocks per year with this cycle repeating each time. During the summer, withdrawal volumes increase due to additional water usage for flock cooling purposes. A few farms have additional sanitary and other agricultural uses (crops/other livestock).

**Facility Specific:**

Dennis Farm has four production wells (Well #1 through Well #4) serving six existing poultry houses. The existing houses are 46 ft wide by 560 ft long. The facility also has eight newly constructed wells (Wells 7 through 14) that are planned to serve an additional 8 poultry houses, each 61 ft by 560 ft in size. Proposed withdrawal limits for all of the houses were calculated based on the total of both consumption (drinking water) and cooling. Water use for consumption was calculated based on meter readings at the existing houses. Water use for cooling was estimated based on house size and cooling fan capacity.

The proposed withdrawal limits and well construction details are as follows:

**Proposed Withdrawal Limits:**

| <b>Proposed Withdrawal Limits</b> |   |
|-----------------------------------|---|
| <b>Annual Value</b>               | 16,800,000 gallons (46,027 average gpd) |
| <b>Monthly Value</b>              | 3,900,000 gallons (125,806 average gpd) |

**Proposed Apportionment of Withdrawal:**

As all wells are screened in the same aquifer and withdrawals are expected to be equally well spread across the system wells no apportionment is required.

**Production Well(s):**

| <b>Identification</b>   | <b>Location</b>  | <b>Construction</b>   | <b>Pump Intake (ft bls)</b> | <b>Source Aquifer</b>    |
|---|--|---|-----------------------------|--------------------------|
| Owner Well Name: Well #1<br><br>DEQ Well Number: 100-01347<br><br>MPID: 374800075375501 | Lat: 37.80012<br>Lon: -75.63199<br>Datum: WGS84<br>Elevation: 40 | Completion Date: 1/10/2006<br>Screens (ft-bls): 220-240<br>Total Depth (ft-bls): 240          | 100                         | Middle Yorktown-Eastover |
| Owner Well Name: Well #2<br><br>DEQ Well Number: 100-01348<br><br>MPID: 374759075375202 | Lat: 37.79978<br>Lon: -75.63117<br>Datum: WGS84<br>Elevation: 40 | Completion Date: 1/6/2005<br><br>Screens (ft-bls): na<br>220-240<br>Total Depth (ft-bls): 240 | 100                         | Middle Yorktown-Eastover |

| Identification  | Location   | Construction  | Pump Intake (ft bls) | Source Aquifer           |
|---|--|---|----------------------|--------------------------|
| Owner Well Name: Well #3<br><br>DEQ Well Number: 100-01349<br><br>MPID: 374757075375403 | Lat: 37.79928<br>Lon: -75.6317<br>Datum: WGS84<br>Elevation: 42        | Completion Date: 1/4/2006<br><br>Screens (ft-bls): na<br>220-240<br>Total Depth (ft-bls): 240 | 100                  | Middle Yorktown-Eastover |
| Owner Well Name: Well #4<br><br>DEQ Well Number: 100-01350<br><br>MPID: 374759075375604 | Lat: 37.79966<br>Lon: -75.63222<br>Datum: WGS84<br>Elevation: 42       | Completion Date: 1/2/2006<br><br>Screens (ft-bls): na<br>220-240<br>Total Depth (ft-bls): 240 | 100                  | Middle Yorktown-Eastover |
| Owner Well Name: Well #7<br><br>DEQ Well Number: 100-01353<br><br>MPID: 374750075380607 | Lat: 37.797355<br>Lon: -75.635077<br>Datum: WGS84<br>Elevation: 40.066 | Completion Date: 2/21/18<br><br>Screens (ft-bls): na<br>205-235<br>Total Depth (ft-bls): 235  | 125                  | Middle Yorktown-Eastover |
| Owner Well Name: Well #8<br><br>DEQ Well Number: 100-01354<br><br>MPID: 374750075380708 | Lat: 37.797209<br>Lon: -75.63526<br>Datum: WGS84<br>Elevation: 39.541  | Completion Date: 2/28/18<br><br>Screens (ft-bls): na<br>205-235<br>Total Depth (ft-bls): 235  | 125                  | Middle Yorktown-Eastover |
| Owner Well Name: Well #9<br><br>DEQ Well Number: 100-01355<br><br>MPID: 374749075380809 | Lat: 37.797015<br>Lon: -75.635504<br>Datum: WGS84<br>Elevation: 39.488 | Completion Date: 2/21/18<br><br>Screens (ft-bls): na<br>205-235<br>Total Depth (ft-bls): 235  | 125                  | Middle Yorktown-Eastover |

| Identification   | Location  | Construction   | Pump Intake (ft bls) | Source Aquifer           |
|--|---|--|----------------------|--------------------------|
| Owner Well Name: Well #10<br><br>DEQ Well Number: 100-01356<br><br>MPID: 374749075380810 | Lat: 37.796868<br>Lon: - 75.635687<br>Datum: WGS84<br>Elevation: 39.921 | Completion Date: 2/21/18<br><br>Screens (ft-bls): na<br>205-235<br>Total Depth (ft-bls): 235 | 125                  | Middle Yorktown-Eastover |
| Owner Well Name: Well #11<br><br>DEQ Well Number: 100-01357<br><br>MPID: 374754075381111 | Lat: 37.798367<br>Lon: - 75.636354<br>Datum: WGS84<br>Elevation: 39.649 | Completion Date: 2/21/18<br><br>Screens (ft-bls): na<br>200-230<br>Total Depth (ft-bls): 230 | 125                  | Middle Yorktown-Eastover |
| Owner Well Name: Well #12<br><br>DEQ Well Number: 100-01358<br><br>MPID: 374754075381212 | Lat: 37.79822<br>Lon: - 75.636536<br>Datum: WGS84<br>Elevation: 39.445  | Completion Date: 2/21/18<br><br>Screens (ft-bls): na<br>200-230<br>Total Depth (ft-bls): 230 | 125                  | Middle Yorktown-Eastover |
| Owner Well Name: Well #13<br><br>DEQ Well Number: 100-01359<br><br>MPID: 374753075381213 | Lat: 37.798025<br>Lon: - 75.636779<br>Datum: WGS84<br>Elevation: 39.176 | Completion Date: 2/21/18<br><br>Screens (ft-bls): na<br>200-230<br>Total Depth (ft-bls): 230 | 125                  | Middle Yorktown-Eastover |
| Owner Well Name: Well #14<br><br>DEQ Well Number: 100-01360<br><br>MPID: 374752075381314 | Lat: 37.797877<br>Lon: - 75.636961<br>Datum: WGS84<br>Elevation: 39.127 | Completion Date: 2/21/18<br><br>Screens (ft-bls): na<br>200-230<br>Total Depth (ft-bls): 230 | 125                  | Middle Yorktown-Eastover |

### Geologic Setting:

The Dennis Farm wells (applicant wells) are located in central Accomack County. The production wells are screened in the Middle Yorktown-Eastover aquifer. The upper portion of the Yorktown-Eastover aquifer (described in the 2006 Virginia Coastal Plain Hydrologic Framework<sup>1</sup> (VCPHF) as a combination of the

<sup>1</sup> McFarland, E.R., and Bruce, T.S., 2006, The Virginia Coastal Plain Hydrogeologic Framework: U.S. Geological Survey

Upper, Middle, and Lower Yorktown-Eastover aquifers) is composed primarily of estuarine to marine quartz sands of the Yorktown Formation of Pliocene age. The nearest USGS geologic cross section found in USGS Professional Paper 1731 is cross-section GS-GS' (see attached figure at the end of the report).

#### Virginia Eastern Shore Model data:

The following table lists the location of the applicant production wells within the Virginia Eastern Shore Model<sup>2</sup> (VAHydroGW-ES).

| VAHydroGW-ES Model Grid |             |                 |     |        |
|-------------------------|-------------|-----------------|-----|--------|
| Well                    | Well Number | MPID            | Row | Column |
| Well #1                 | 100-01347   | 374800075375501 | 99  | 48     |
| Well #2                 | 100-01348   | 374759075375202 | 99  | 48     |
| Well #3                 | 100-01349   | 374757075375403 | 99  | 48     |
| Well #4                 | 100-01350   | 374759075375604 | 99  | 48     |
| Well #7                 | 100-01353   | 374750075380607 | 100 | 48     |
| Well #8                 | 100-01354   | 374750075380708 | 100 | 48     |
| Well #9                 | 100-01355   | 374749075380809 | 100 | 48     |
| Well #10                | 100-01356   | 374749075380810 | 100 | 48     |
| Well #11                | 100-01357   | 374754075381111 | 100 | 47     |
| Well #12                | 100-01358   | 374754075381212 | 100 | 47     |
| Well #13                | 100-01359   | 374753075381213 | 100 | 47     |
| Well #14                | 100-01360   | 374752075381314 | 100 | 47     |

#### Hydrologic Framework:

Data from the VCPHF is reported in this technical report to illustrate the hydrogeologic characteristics of the aquifers in the Virginia Eastern Shore near the applicant wells and identify major discrepancies between regional hydrogeology and site logs interpreted by the DEQ staff geologist.

The following average aquifer elevations were estimated from the VAHydroGW-ES at the model cell(s) containing the applicant production wells.

| VAHydroGW-ES Average Hydrologic Unit Information |                      |                  |
|--|----------------------|------------------|
| Aquifer  | Elevation (feet msl) | Depth (feet bls) |
| Surface  | 39                   | 0                |
| Columbia aquifer (bottom)                        | -30                  | 69               |
| Upper Yorktown-Eastover aquifer (top)            | -99                  | 138              |
| Upper Yorktown-Eastover aquifer (bottom)         | -113                 | 152              |
| Middle Yorktown-Eastover aquifer (top)           | -137                 | 176              |
| Middle Yorktown-Eastover aquifer (bottom)        | -195                 | 235              |
| Lower Yorktown-Eastover aquifer (top)            | -208                 | 248              |
| Lower Yorktown-Eastover aquifer (bottom)         | -305                 | 344              |

Professional Paper 1731, 118 p., 25 pls.

<sup>2</sup> Sanford, W.E., Pope, J.P., and Nelms, D.L., 2009, Simulation of groundwater-level and salinity changes in the Eastern Shore, Virginia: U.S. Geological Survey Scientific Investigations Report 2009-5066, 125 p.

**Groundwater Characterization Program Recommendations:**

A DEQ staff geologist has reviewed geophysical logs and drill cutting obtained during construction of Wells #7, 10, 11 and 14 and made the following determinations regarding the location of the aquifer tops for the following wells:

| Unit                                   | Well #7<br>(ft-bls) | Well #10<br>(ft-bls) | Well #11<br>(ft-bls) | Well #14<br>(ft-bls) |
|--|---------------------|----------------------|----------------------|----------------------|
| Bottom of the Columbia                 | 55                  |                      |                      |                      |
| Top of the Upper Yorktown-Eastover     | 130                 |                      |                      |                      |
| Bottom of the Upper Yorktown-Eastover  | 140                 |                      |                      |                      |
| Top of the Middle Yorktown-Eastover    | 165                 | 165                  | 165                  | 165                  |
| Bottom of the Middle Yorktown-Eastover | 240                 | 240                  | 235                  | 235                  |
| Top of the Lower Yorktown-Eastover     | 260                 |                      |                      |                      |
| Bottom of the Lower Yorktown-Eastover  |                     |                      |                      |                      |

**Comparison of the Hydrogeologic Framework and Groundwater Characterization Program Recommendations:**

The average Middle Yorktown-Eastover aquifer top and bottom elevations of -125.3 ft-msl/165 ft-bls and -197.8 ft-msl/237.5 ft-bls provided by the DEQ staff geologist are higher than and approximately equal to, respectively, the elevations reported in the VAHydroGW-ES framework (-137 ft-msl/176 ft-bls and -195 ft-msl/235 ft-bls). Thus, the unit thickness in the VAHydroGW-ES for the Middle Yorktown-Eastover aquifer is thinner than the unit thickness supplied by DEQ staff by approximately 14 feet. Local variations not captured on the regional scale of the VAHydroGW-ES are expected to occur. The VAHydroGW-ES is updated on a regular basis to reflect the most up-to-date surface elevations that are available.

**Eastern Shore Hydrogeologic Framework Based Recommendations:**

Well numbers 1 through 4 (supplying houses 1 – 6) are located approximately 1510 ft northeast of well numbers 7 through 14 (houses 7 – 14). Due to a lack of geophysical borehole data at these well locations, DEQ staff has reviewed available information and made the following preliminary determinations regarding the location of the aquifer tops for well numbers 1 through 4 based upon a review of the GW-2 forms available and The Virginia Coastal Plain Hydrogeologic Framework (USGS Professional Paper 1731). Further evaluation of aquifer tops may be conducted during the upcoming permit term and as additional geophysical information becomes available.

| Unit                                | Well #1<br>(ft-bls) | #2  | #3  | #4  |
|-------------------------------------|---------------------|-----|-----|-----|
| Top of the Upper Yorktown-Eastover  | 141                 | 143 | 143 | 141 |
| Top of the Middle Yorktown-Eastover | 179                 | 182 | 181 | 179 |
| Top of the Lower Yorktown-Eastover  | 251                 | 254 | 253 | 251 |

**Water Level Comparison:**

Below water levels retrieved from the USGS regional observation network wells are compared to the simulated water levels reported in the *Virginia Eastern Shore 2017-2018 Annual Simulation of Potentiometric Groundwater Surface Elevations of Reported and Total Permitted Use* report (the 2017-

2018 report) and simulation files.<sup>3</sup> This comparison is made in order to evaluate the performance of the regional model in the vicinity of the applicant wells and assess historical groundwater trends.

The 2017-2018 report provides two sets of simulated potentiometric water surface elevations. The VAHydroGW-ES model is divided into three parts. The first portion of the model simulates water levels within the Eastern Shore aquifers from 1900 through 2017 based upon historically reported pumping amounts (the “*Historic Use Simulation*”). This portion of the model has been calibrated to match water levels observed in USGS regional observation network wells situated throughout the peninsula. The water levels reported in the 2017-2018 report are based upon two separate simulations, each simulation running from 2018 through 2067. The simulated pumping amount in these two simulations are based upon, 1) the average 2013-2017 reported withdrawal amount of wells in the VAHydroGW-ES model (the “*Reported Use Simulation*”) and, 2) the current (2018) maximum withdrawal amount allowed under their current permit for wells in the VAHydroGW-ES model (the “*Total Permitted Simulation*”). Both these simulations are an extension of the *Historic Use Simulation* and the water levels reported in the 2017-2018 report are the final water levels simulated at the end of the simulations (2067).

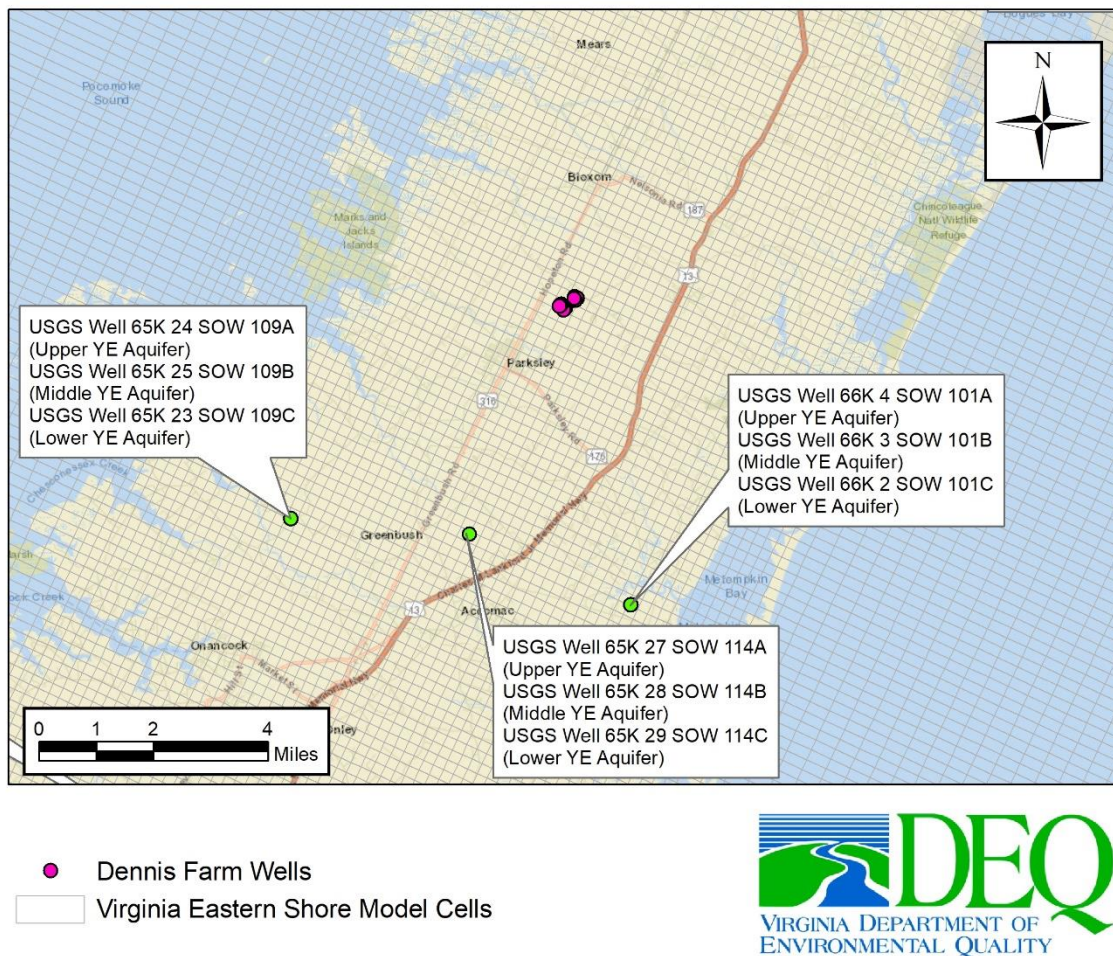
The “VAHydroGW-ES 2067 Reported Use Water Level,” reported in the tables below, is the simulated water level – 50 years from present – if all permitted pumping continued at the average 2013-2017 reported withdrawal amount for the next 50 years. And the “VAHydroGW-ES 2067 Total Permitted Water Level,” reported in the tables below, is the simulated water level – 50 years from present – if all Eastern Shore permitted wells were to pump at the maximum permitted amount allowed under their current permit for the next 50 years. Finally, the “VAHydroGW-ES 2017 Historic Use Water Level,” reported in the tables below, is the water level simulated for the year 2017 in the *Historic Use Simulation*.

The nearest USGS regional observation network wells to the applicant wells, completed in the Upper, Middle, or Lower Yorktown-Eastover aquifers, are listed in the following tables and shown in Figure 1. For the USGS regional observation network wells, average 2017 reported water levels are shown in the following tables. Simulated water levels for the Upper, Middle, and Lower Yorktown-Eastover aquifers, for the VAHydroGW-ES cells containing the USGS regional observation network wells are also shown in the following tables.

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<sup>3</sup> See *Virginia Eastern Shore 2017-2018 Annual Simulation of Potentiometric Groundwater Surface Elevations of Reported and Total Permitted Use* report and simulation files on file with the VA DEQ.





**Figure 1. Nearest USGS regional observation network wells.**

Comparing the VAHydroGW-ES 2017 Historic Use Water Level with the USGS Network Well 2017 Water Level provides a method for judging the accuracy of the VAHydroGW-ES. Figures 2 through 10 show graphs of the recorded water levels from the USGS observation wells listed in the following tables. These figures also show the simulated VAHydroGW-ES *Historic Use Simulation* water levels for the model cell containing each USGS well. Observing the simulated and observed water elevations together provide a second method for assessing the accuracy of the VAHydroGW-ES in the vicinity of the applicant wells.

The Upper Yorktown-Eastover VAHydroGW-ES 2017 Reported Use Water Levels are essentially the same values as the USGS Network Well 2017 Water Level observed in Well 65K 24 SOW 109A and Well 66K 4 SOW 101A; while the 2017 VAHydroGW-ES water level is a few feet higher than the level observed in Well 65K 27 SOW 114A. The water levels observed over the past approximately 40 years in each Upper Yorktown-Eastover USGS well are shown in Figures 2 through 4. The wells exhibit yearly fluctuations in water levels of approximately 2 to 5 feet. Water levels simulated by the VAHydroGW-ES do not fluctuate in the same manner because the pumping and recharge simulated in the model for any given year are averaged over the year and entered in the model as the average value for the year. Water levels for Well 65K 24 SOW 109A and Well 66K 4 SOW 101A are in general agreement with the water levels simulated by the VAHydroGW-ES. Water levels for Well 65K 27 SOW 114A are approximately 5 feet lower for the past decade than those simulated by the VAHydroGW-ES.

The Middle Yorktown-Eastover VAHydroGW-ES 2017 Reported Use Water Levels are five feet higher to 14 feet lower than the USGS Network Well 2017 Water Levels observed in Well 65K 25 SOW 109B,

Well 65K 28 SOW 114B, and Well 66K 3 SOW 101B. The water levels observed over the past 30 to 40 years in the Middle Yorktown-Eastover USGS wells are shown in Figures 5 through 7. Each well exhibits yearly fluctuations in water levels of approximately 2 to 10 feet. Water levels for the USGS Middle Yorktown-Eastover wells are in general agreement with the water level simulated by the VAHydroGW-ES – especially for Well 66K 3 SOW 101B. While still reasonably accurate, water levels for Well 65K 25 SOW 109B are higher by approximately 5 feet than those simulated by the VAHydroGW-ES over the past 40 years. The fluctuations and general patterns observed in Well 65K 28 SOW 114B are generally simulated by the VAHydroGW-ES. The large spike in the simulated water level at the end of 2012 (observed in Well 65K 28 SOW 114B and Well 66K 3 SOW 101B) is due to a significant reduction in reported pumping for the year 2012 by a large, nearby withdrawal. The absence of a corresponding jump in water levels in the USGS observation wells indicates that the reported pumping amounts for the year 2012 may not have matched the actual pumping in the vicinity of the well.

The Lower Yorktown-Eastover VAHydroGW-ES 2017 Reported Use Water Level is the same value as the USGS Network Well 2017 Water Level observed in Well 66L 1 SOW 107C. The VAHydroGW-ES 2017 value for USGS Well 65K 23 SOW 109C is approximately 2 feet higher; while the 2017 VAHydroGW-ES water level is approximately 14 feet lower than the level observed in Well 65K 98 SOW 114C. The water levels observed over the past 30 to 40 years in the Lower Yorktown-Eastover USGS wells are shown in Figures 8 through 10. Each well exhibits yearly fluctuations in water levels of approximately 2 to 10 feet. Water levels for the USGS Lower Yorktown-Eastover wells are in general agreement with the water level simulated by the VAHydroGW-ES – with the same general discrepancies noted in the Middle Yorktown-Eastover observations.

Differences between observed and simulated water levels will be noted and addressed during the next calibration of the VAHydroGW-ES.

| <b>Upper Yorktown-Eastover Measurements</b>            | <b>65K 24<br/>SOW 109A</b> | <b>65K 27<br/>SOW 114A</b> | <b>66K 4<br/>SOW 101A</b> |
|--|----------------------------|----------------------------|---------------------------|
| Distance from applicant wells (miles)                  | 6.0                        | 4.2                        | 5.3                       |
| VAHydroGW-ES Row                                       | 128                        | 123                        | 122                       |
| VAHydroGW-ES Column                                    | 33                         | 49                         | 65                        |
| VAHydroGW-ES Land Surface Elevation (ft-msl)           | 13                         | 45                         | 10                        |
| USGS Well Land Surface Elevation (ft-msl)              | 12                         | 45                         | 10                        |
| USGS Network Well 2017 Water Level (ft-msl)            | 5.8                        | -0.3                       | 3.5                       |
| VAHydroGW-ES 2017 Reported Use Water Level (ft-msl)    | 5.7                        | 2.7                        | 3.1                       |
| VAHydroGW-ES 2067 Reported Use Water Level (ft-msl)    | 5.6                        | 2.5                        | 2.9                       |
| VAHydroGW-ES 2067 Total Permitted Water Level (ft-msl) | 4.3                        | -1.4                       | 1.7                       |

| Middle Yorktown-Eastover Measurements                  | 65K 25<br>SOW 109B | 65K 28<br>SOW 114B | 66K 3<br>SOW 101B |
|--|--------------------|--------------------|-------------------|
| Distance from applicant wells (miles)                  | 6.0                | 4.2                | 5.3               |
| VAHydroGW-ES Row                                       | 128                | 123                | 122               |
| VAHydroGW-ES Column                                    | 33                 | 49                 | 65                |
| VAHydroGW-ES Land Surface Elevation (ft-msl)           | 13                 | 45                 | 10                |
| Land Surface Elevation (ft-msl)                        | 12                 | 45                 | 8                 |
| USGS Network Well 2017 Water Level (ft-msl)            | 0.2                | -29                | 1.2               |
| VAHydroGW-ES 2017 Reported Use Water Level (ft-msl)    | 5.3                | -43.6              | 0.7               |
| VAHydroGW-ES 2067 Reported Use Water Level (ft-msl)    | 5.2                | -41.8              | 0.5               |
| VAHydroGW-ES 2067 Total Permitted Water Level (ft-msl) | 3.9                | -49.4              | -2.1              |

| Lower Yorktown-Eastover Measurements                   | 65K 23<br>SOW<br>109C | 65K 29<br>SOW<br>114C | 66K 2<br>SOW<br>101C |
|--|-----------------------|-----------------------|----------------------|
| Distance from applicant wells (miles)                  | 6.0                   | 4.2                   | 5.3                  |
| VAHydroGW-ES Row                                       | 128                   | 123                   | 122                  |
| VAHydroGW-ES Column                                    | 33                    | 49                    | 65                   |
| VAHydroGW-ES Land Surface Elevation (ft-msl)           | 13                    | 45                    | 10                   |
| Land Surface Elevation (ft-msl)                        | 13                    | 45                    | 10                   |
| USGS Network Well 2017 Water Level (ft-msl)            | -0.3                  | -49.2                 | -1.7                 |
| VAHydroGW-ES 2017 Reported Use Water Level (ft-msl)    | 1.8                   | -63.6                 | -1.7                 |
| VAHydroGW-ES 2067 Reported Use Water Level (ft-msl)    | 1.5                   | -61.5                 | -1.9                 |
| VAHydroGW-ES 2067 Total Permitted Water Level (ft-msl) | 0.1                   | -62.8                 | -3.1                 |

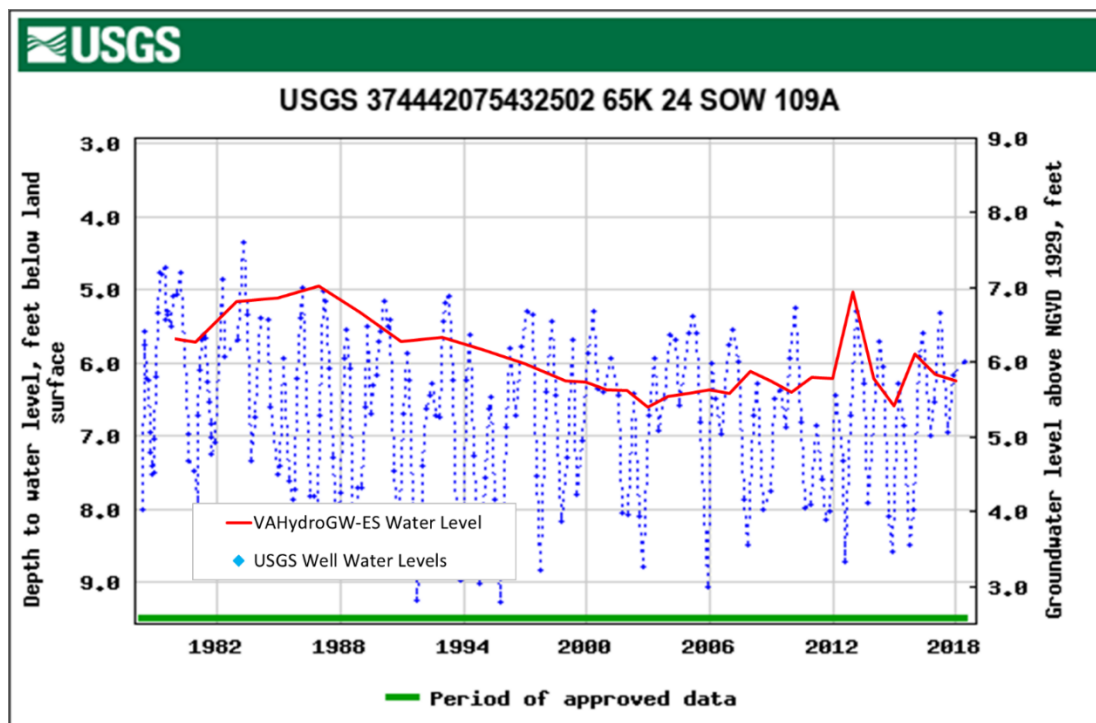


Figure 2. USGS Regional Observation Well 65K 24 SOW 109A, Upper Yorktown-Eastover aquifer water levels recorded from 1978 to present (well depth 130 ft bls, land surface 12 ft msl).

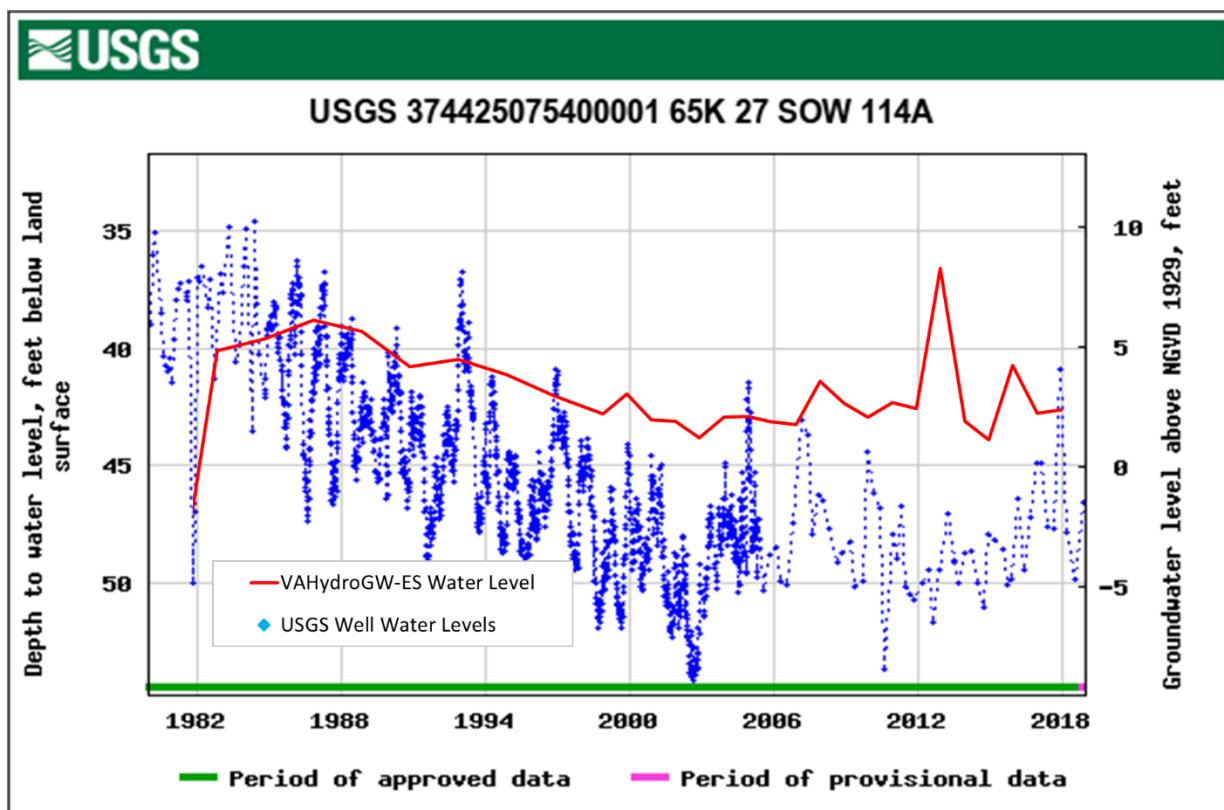


Figure 3. USGS Regional Observation Well 65K 27 SOW 114A, Upper Yorktown-Eastover aquifer water levels recorded from 1980 to present (well depth 160 ft bls, land surface 45 ft msl).

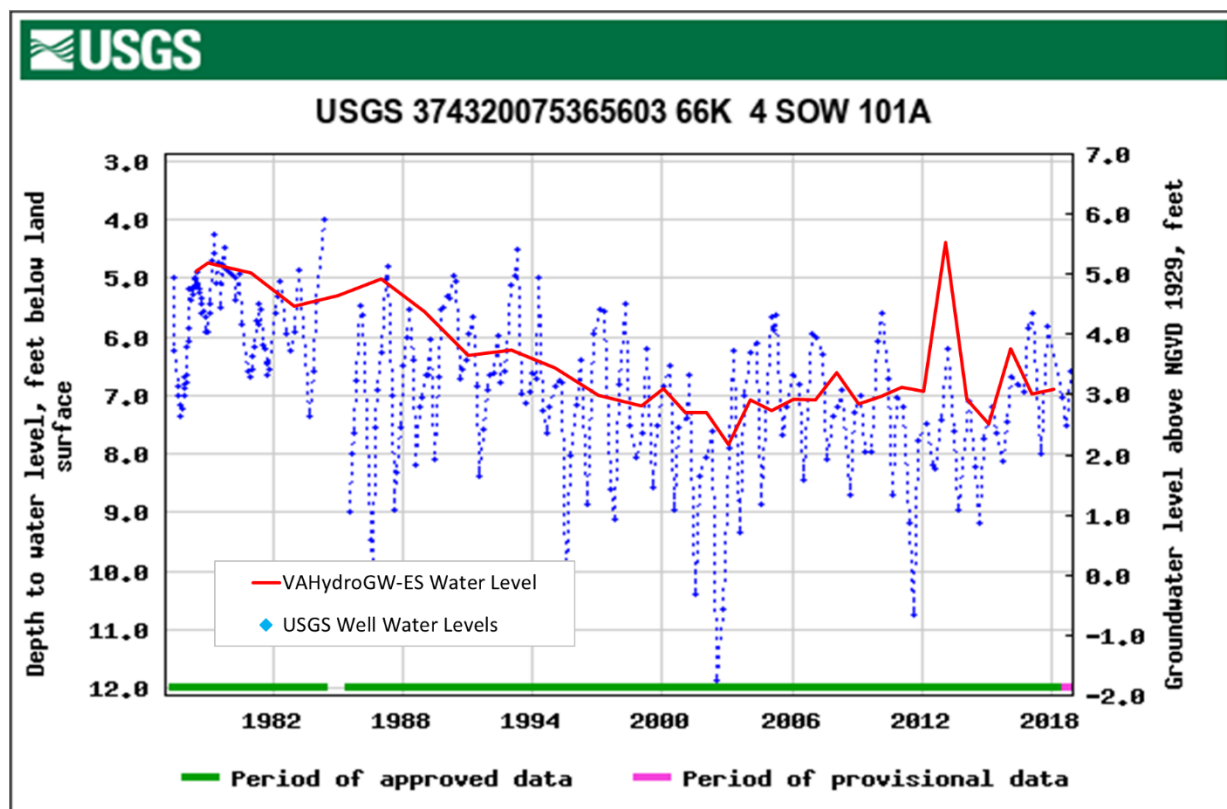


Figure 4. USGS Regional Observation Well 66K 4 SOW 101A, Upper Yorktown-Eastover aquifer water levels recorded from 1977 to present (well depth 152 ft bls, land surface 10 ft msl).



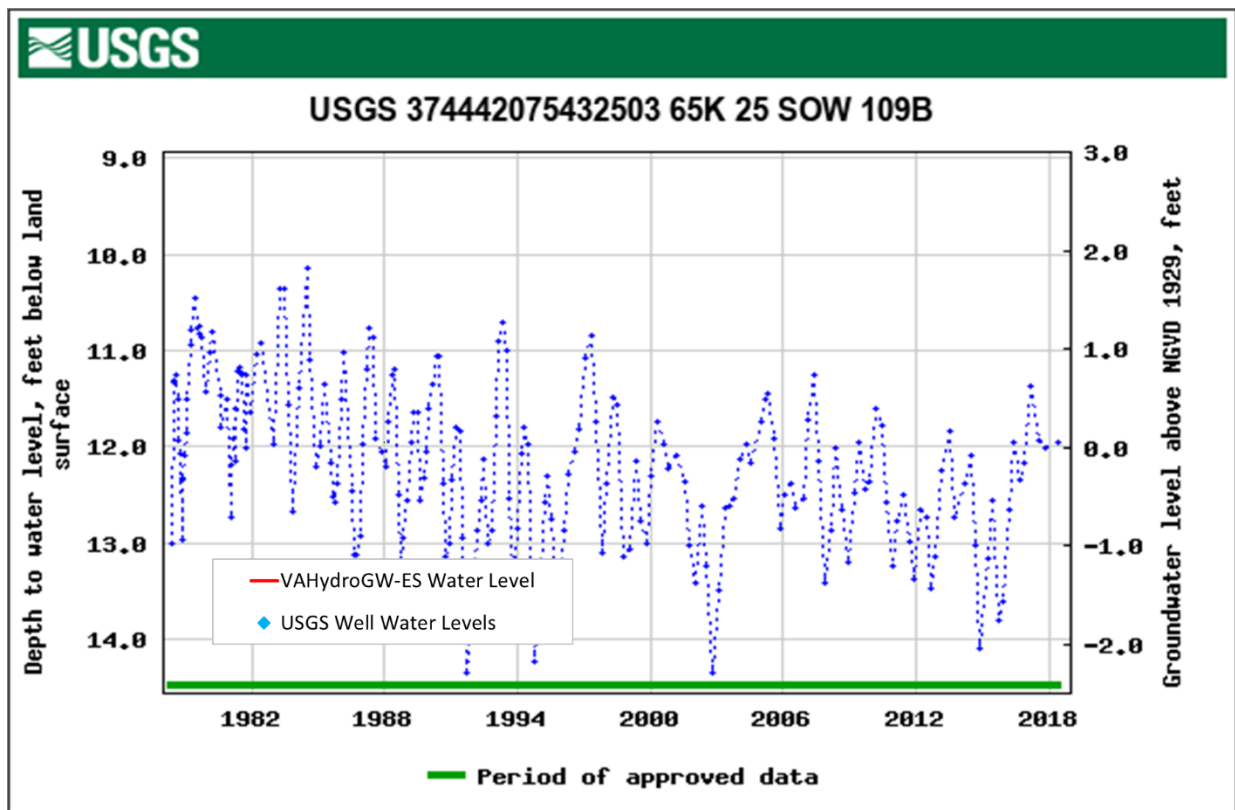


Figure 5. USGS Regional Observation Well 65K 25 SOW 109B, Middle Yorktown-Eastover aquifer water levels recorded from 1978 to present (well depth 228 ft bls, land surface 12 ft msl).

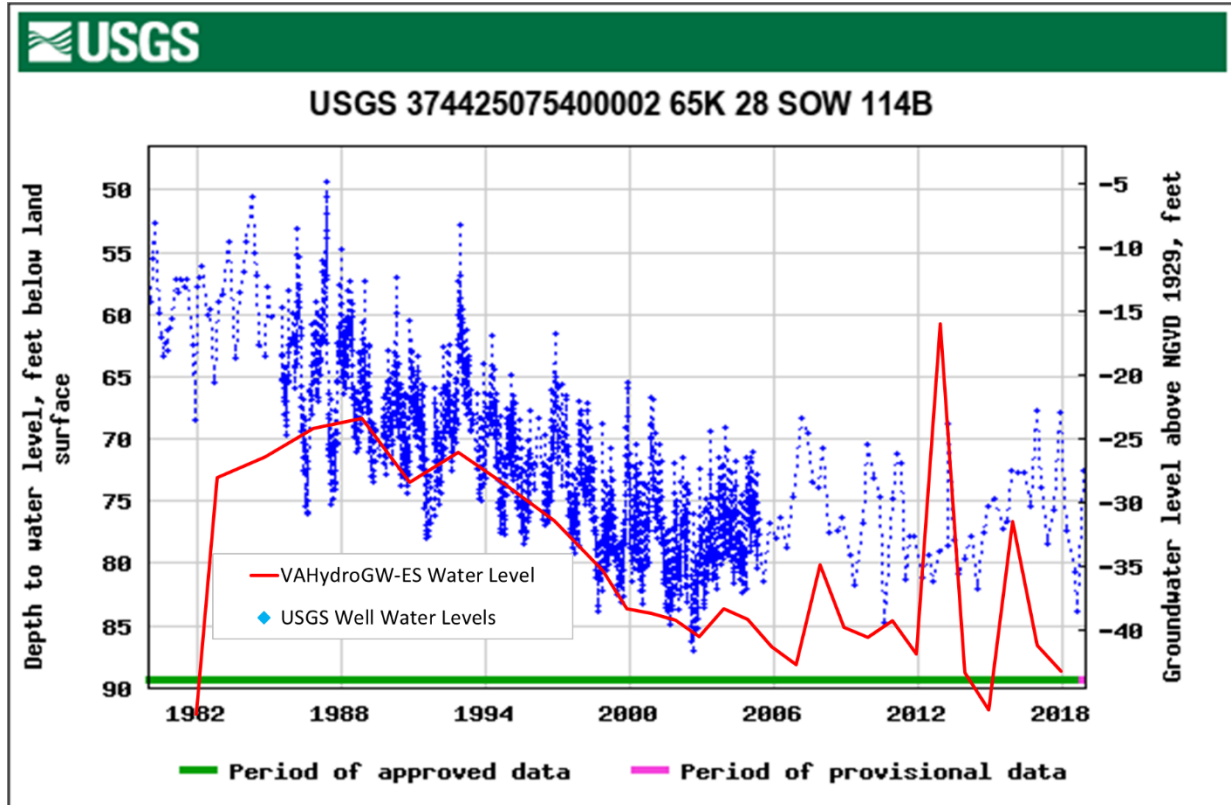


Figure 6. USGS Regional Observation Well 65K 28 SOW 114B, Middle Yorktown-Eastover aquifer water levels recorded from 1980 to present (well depth 230 ft bls, land surface 45 ft msl).

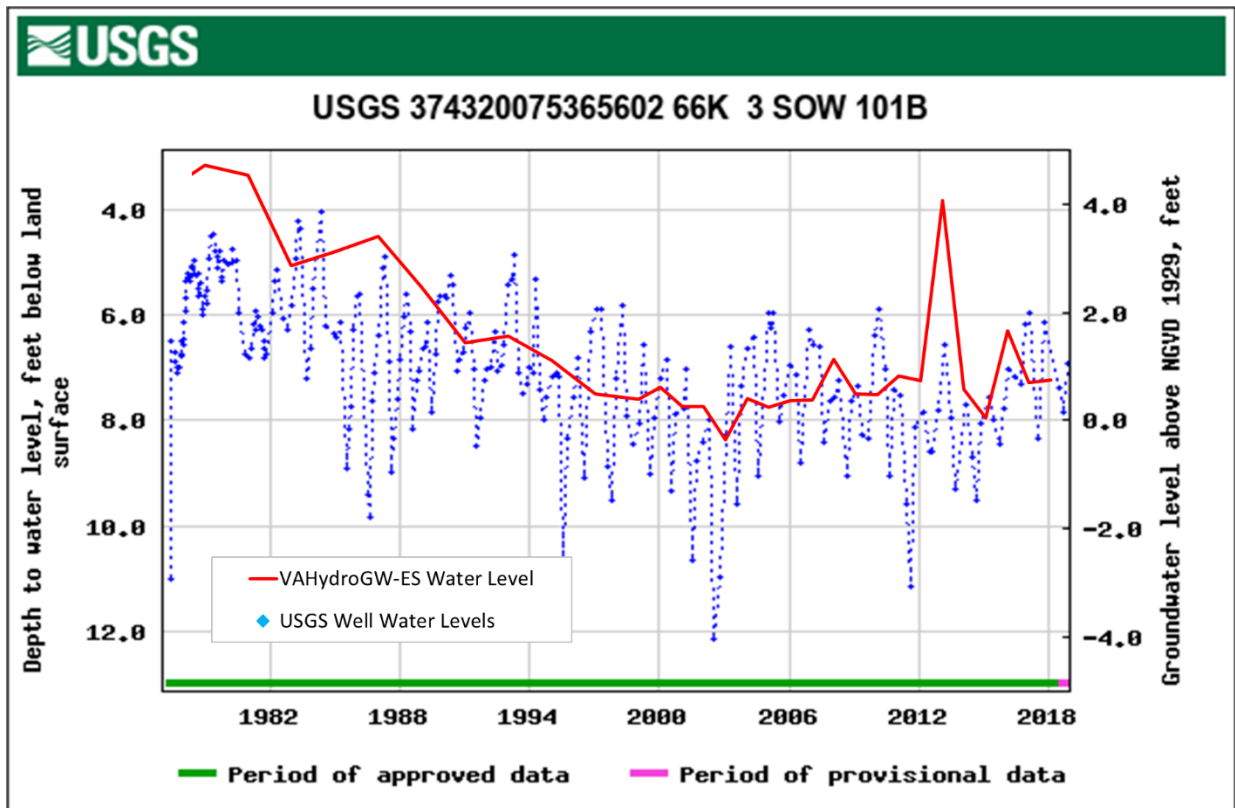


Figure 7. USGS Regional Observation Well 66K 3 SOW 101B, Middle Yorktown-Eastover aquifer water levels recorded from 1977 to present (well depth 222 ft bls, land surface 10 ft msl).

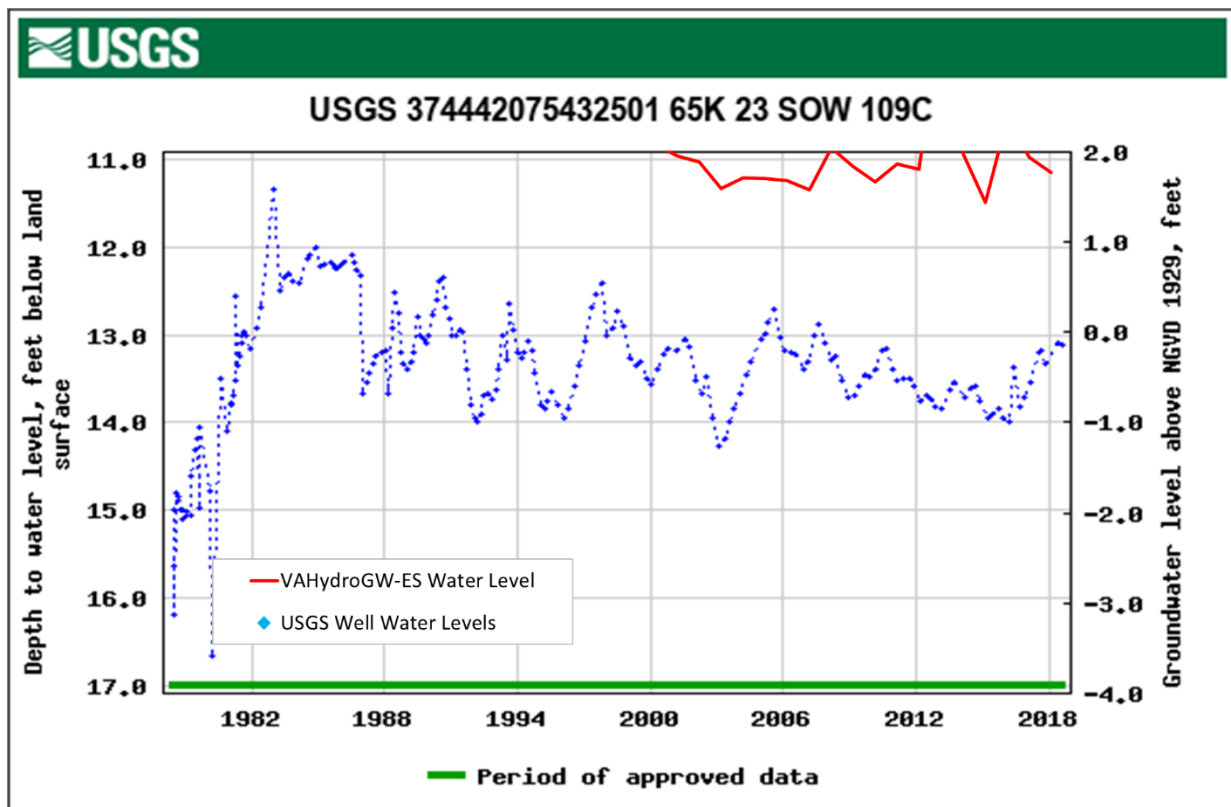


Figure 8. USGS Regional Observation Well 65K 23 SOW 109C, Lower Yorktown-Eastover aquifer water levels recorded from 1978 to present (well depth 290 ft bls, land surface 13 ft msl).

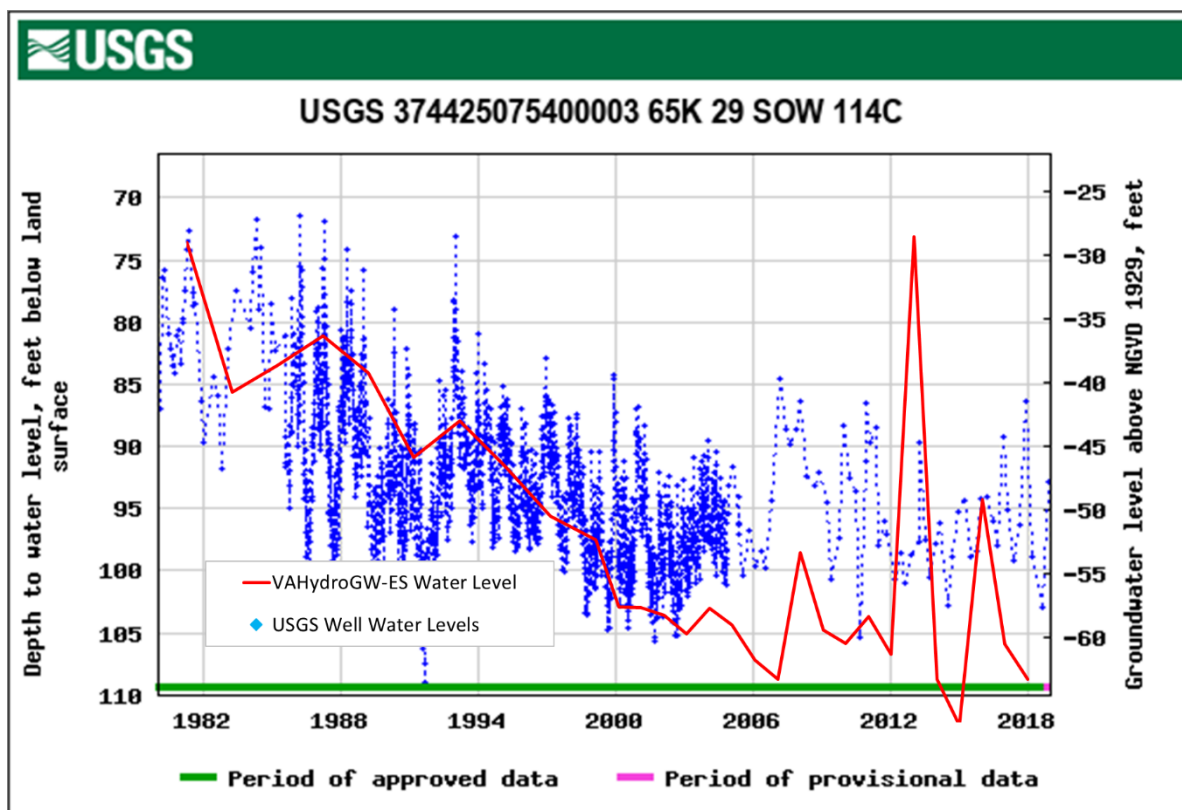


Figure 9. USGS Regional Observation Well 65K 29 SOW 114C, Lower Yorktown-Eastover aquifer water levels recorded from 1980 to present (well depth 315 ft bls, land surface 45 ft msl).

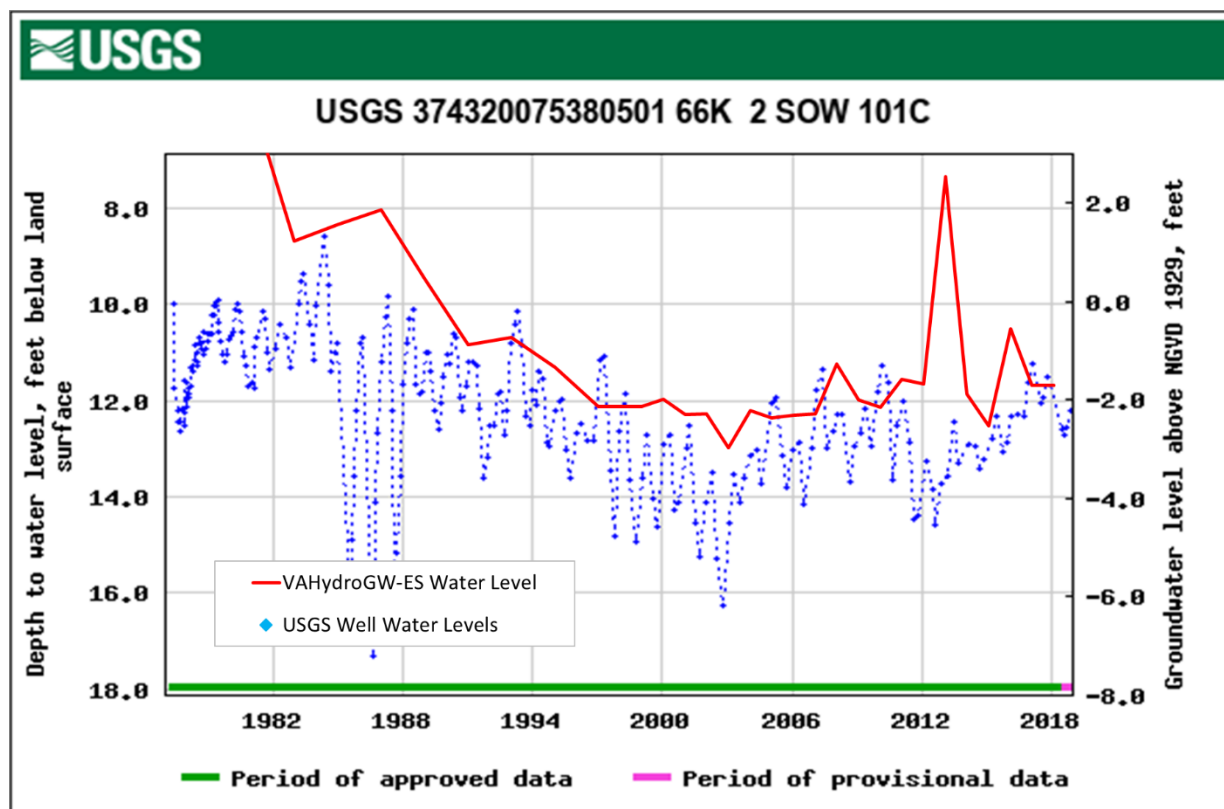


Figure 10. USGS Regional Observation Well 66K 2 SOW 101C, Lower Yorktown-Eastover aquifer water levels recorded from 1977 to present (well depth 292 ft bls, land surface 10 ft msl).

**Aquifer Test(s):**

An aquifer test has not been conducted for this system and the VAHydroGW-ES model was used to evaluate the application. The following table provides the average hydrogeologic properties assigned to the VAHydroGW-ES cell(s) containing the applicant wells.

| Virginia Eastern Shore Model Hydrogeologic Properties: Row 99 & 100/Column 47 & 48 |                          |                          |                          |                                    |                                  |                           |                |
|--|--------------------------|--------------------------|--------------------------|------------------------------------|----------------------------------|---------------------------|----------------|
| Aquifer  | Top Elevation (feet msl) | Top Elevation (feet bls) | Aquifer Thickness (feet) | Horizontal Conductivity (feet/day) | Vertical Conductivity (feet/day) | Specific Storage (1/feet) | Specific Yield |
| Columbia   | 39                       | 0                        | 69                       | 65                                 | 0.5                              | 0.00001                   | 0.15           |
| Upper Yorktown-Eastover  | -99                      | 138                      | 14                       | 5                                  | 2.8                              | 0.000004                  | N/A            |
| Middle Yorktown-Eastover   | -137                     | 176                      | 59                       | 8                                  | 6.5                              | 0.000004                  | N/A            |
| Lower Yorktown-Eastover  | -208                     | 248                      | 97                       | 6                                  | 5.3                              | 0.000004                  | N/A            |

|                      |
|----------------------|
| <b>Model Results</b> |
|----------------------|

**Evaluation of Withdrawal Impacts:**

The VAHydroGW-ES model was used to simulate the effects resulting from the proposed withdrawal due to the multi-aquifer impacts. The stabilized effects resulting from the proposed withdrawal were simulated at the annual permitted withdrawal rate of 16,800,000 gallons per year (46,027 average gpd). The stabilized effects were simulated by replacing the reported use amounts in the 2017 VAHydroGW-ES Reported Use Simulation with the current maximum annual withdrawal limit allowed under the terms of their permit for all Ground Water Management Area (GWMA) permit holders. That same simulation was executed twice, once with the proposed withdrawal removed (the *baseline simulation*), and once with the proposed withdrawal added (the *proposed withdrawal simulation*). The stabilized effects of the proposed withdrawal were considered by simulating both simulations for 50 years and observing the difference in water potentiometric levels at the end of the simulations.

**Area of Impact:**

The area of impact (AOI) for an aquifer is the area where the additional drawdown due to the proposed withdrawal exceeds one foot. The results of the VAHydroGW-ES simulations, outlined in the preceding section, predict areas of impact in the Middle and Lower Yorktown-Eastover aquifers. The AOI areas extend a maximum distance of approximately 0.6 and 0.4 miles from the production center for the Middle and Lower Yorktown-Eastover aquifers. AOI maps for all affected aquifers are attached to this report.

**80 % Drawdown:**

The 80% drawdown criterion was evaluated for all impacted, confined aquifers in the Virginia Eastern Shore using the VAHydroGW-ES *proposed withdrawal simulation*. The elevations of the top of the Upper, Middle, and Lower Yorktown-Eastover aquifers at the VAHydroGW-ES cell (row 100, column 48) simulating the greatest drawdown are -99, -137, and -209 feet msl, respectively. Based on the results of the *proposed withdrawal simulation* the predicted potentiometric water levels at the same VAHydroGW-ES cell are 11.0, 5.6, and 5.9 feet msl for the Upper, Middle, and Lower Yorktown-Eastover aquifers, respectively. The 80% drawdown criterion allows the potentiometric water level (based on the critical surface elevation calculated from the VAHydroGW-ES data) to be reduced to -74.7, -105.7, and -163.5 feet msl in the Upper, Middle, and Lower Yorktown-Eastover aquifers, respectively. Therefore, the water levels in the VAHydroGW-ES cell containing the applicant wells for each confined aquifer are not simulated to fall below the critical surface. Additionally, no new VAHydroGW-ES cells are simulated to have water levels fall below the critical surface. Therefore, this withdrawal is within the limits set by the 80% drawdown criterion.



The requested withdrawal is allocated 100% to the Middle Yorktown-Eastover aquifer. The technical evaluation analysis indicated that the apportionment of the requested withdrawal amount among the applicant production wells had no significant effect on the outcome of the technical evaluation.

### **Water Quality:**

The EPA has established the National Secondary Drinking Water Regulations (NSDWRs) which are non-enforceable guidelines regulating contaminants that may cause cosmetic or aesthetic (such as taste, odor, or color) effects in drinking water. The EPA recommends the secondary standards to water systems – states may choose to adopt them as enforceable standards. The EPA NSDWRs specify the limit on chloride as 250 mg/L.

The VAHydroGW-ES was created "to help the Commonwealth and local water managers better plan water use and estimate future changes in water and salinity levels in response to changes in water use."<sup>4</sup> Use of the model to predict future chloride concentrations results in a "general useful understanding of system behavior, but water-resource managers must be careful in trusting the accuracy of predictions at individual wells from a regional model."<sup>5</sup> Further, chloride concentrations at individual wells, predicted using the regional model, should not be relied upon to predict actual concentrations at those locations.

The potential for adverse changes to water quality due to the requested withdrawal was evaluated using transient, density-dependent, SEAWAT simulations using the VAHydroGW-ES. Two simulations were executed – one simulation without the proposed withdrawal included and a second with the proposed withdrawal included. Both simulations were executed for 50 years. And both used the 2017 total permitted stresses, concentrations, and heads as starting conditions. In an effort to simulate the long-term effects on water quality due to the proposed withdrawal, the amount of 16,800,000 gallons per year (46,027 average gpd) was used for the duration of the second simulation. The two simulations were compared to evaluate the potential for adverse changes to water quality. The results indicated that no model cells simulate an increase in chloride concentration greater than 55 mg/L due to the proposed withdrawal. Therefore, the VAHydroGW-ES model results do not indicate the potential for reduced water quality as a result of the proposed withdrawal.

### **Conclusion:**

The withdrawal requested by Dennis Farm, LLC for the Dennis Farm withdrawal satisfies the technical evaluation criteria for permit issuance. The AOIs for the Middle and Lower Yorktown-Eastover aquifers are shown in the following maps. There are no existing permitted wells located within the applicant's AOIs.

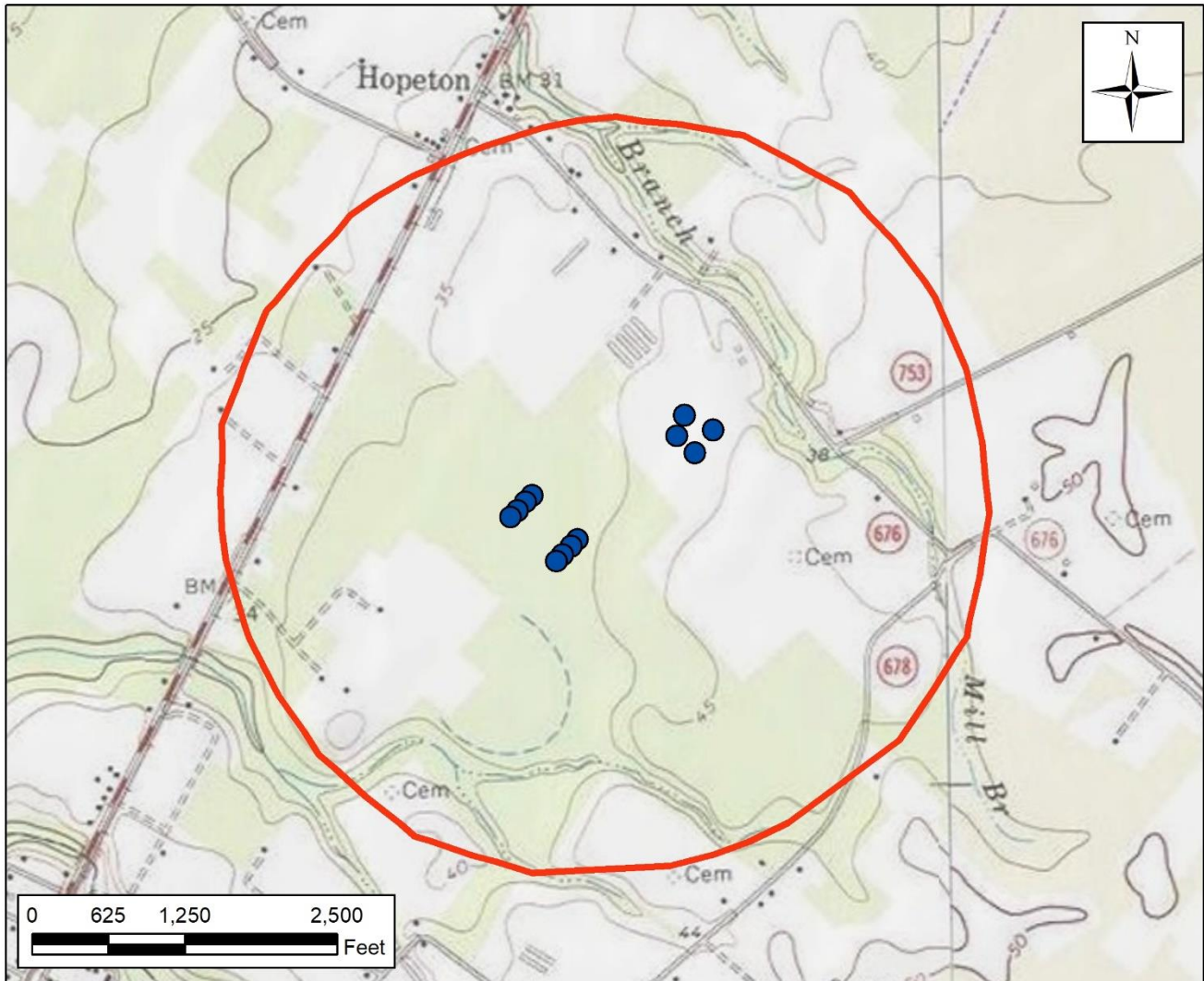
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<sup>4</sup> Sanford, W.E., Pope, J.P., and Nelms, D.L., 2009, Simulation of groundwater-level and salinity changes in the Eastern Shore, Virginia: U.S. Geological Survey Scientific Investigations Report 2009–5066, 125 p.

<sup>5</sup> Sanford, W.E. and Pope, J.P., 2009, Current challenges using models to forecast seawater intrusion: lessons from the Eastern Shore of Virginia, USA. Hydrogeology Journal (2009), Volume: 18, Issue: 1, p: 73-93

# Dennis Farm

## Area of Impact - Middle Yorktown-Eastover Aquifer



● Dennis Farm Wells

○ Middle Yorktown-Eastover Aquifer Area of Impact

Simulated drawdown at or exceeding one foot in the Middle Yorktown-Eastover aquifer resulting from a 16,800,000 gallons per year (46,027 average gpd), 50 year, Middle Yorktown-Eastover withdrawal using the VAHydroGW-ES.

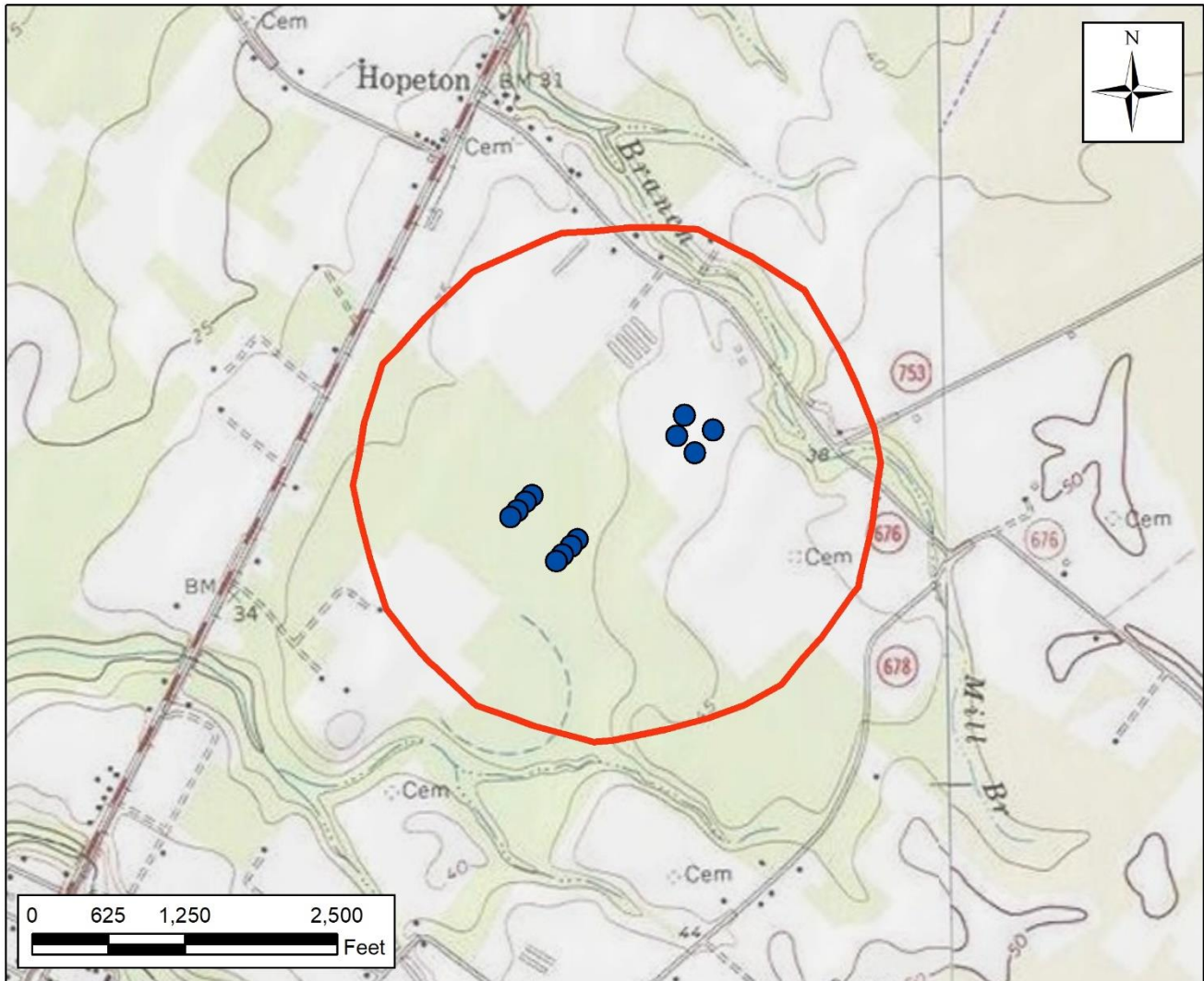
Maximum radius of one foot drawdown (Area of Influence) extends approximately 0.6 miles from the pumping center.

Technical evaluation performed by Aquaveo, LLC for the Virginia DEQ, Office of Water Supply  
December 14, 2018



# Dennis Farm

## Area of Impact - Lower Yorktown-Eastover Aquifer



● Dennis Farm Wells

○ Lower Yorktown-Eastover Aquifer Area of Impact

Simulated drawdown at or exceeding one foot in the Lower Yorktown-Eastover aquifer resulting from a 16,800,000 gallons per year (46,027 average gpd), 50 year, Middle Yorktown-Eastover withdrawal using the VAHydroGW-ES.

Maximum radius of one foot drawdown (Area of Influence) extends approximately 0.4 miles from the pumping center.

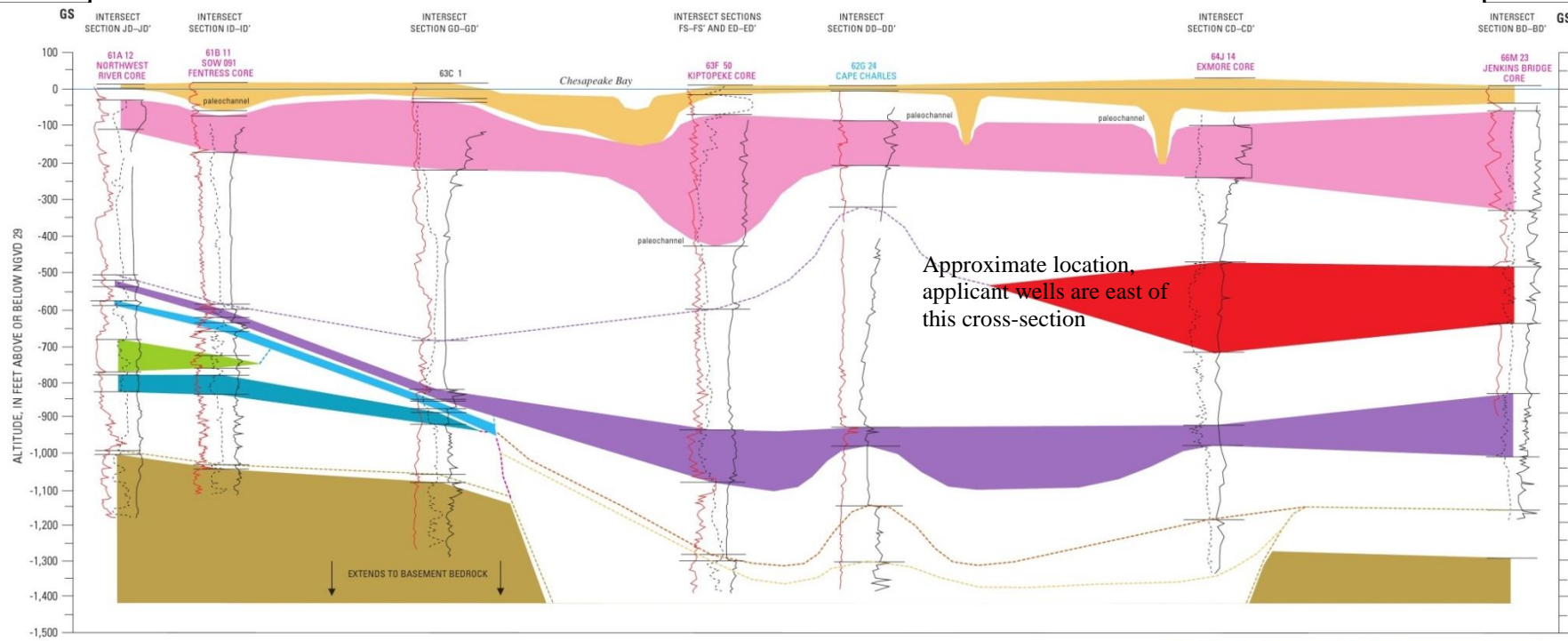
Technical evaluation performed by Aquaveo, LLC for the Virginia DEQ, Office of Water Supply  
December 14, 2018





SOUTH

NORTH



#### EXPLANATION

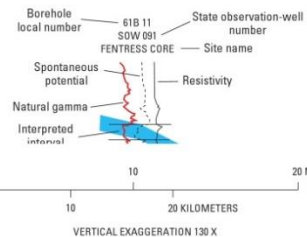
[Aquifers are shown by solid colors. Confining units and zones are shown by intervening blank areas following the sequence below. Where adjacent confining units or zones are in direct contact, the top surface of the unit or zone is shown by dashed lines.]

- Surficial aquifer
- Yorktown confining zone
- Yorktown-Eastover aquifer
- Saint Marys confining unit
- Saint Marys aquifer
- Calvert confining unit
- Piney Point aquifer
- Chickahominy confining unit
- Exmore Matrix confining unit
- Exmore Clast confining unit
- Nanjemoy-Marlboro confining unit

- Aquia aquifer
- Pee Dee confining zone
- Pee Dee aquifer
- Virginia Beach confining zone
- Virginia Beach aquifer
- Upper Cenomanian confining unit
- Potomac confining zone
- Potomac aquifer
- Basement bedrock

#### BOREHOLE GEOPHYSICAL LOG

[Heading in blue indicates lithologic control from detailed cuttings descriptions, and in magenta from core. Heading in black indicates only drillers logs or no lithologic information available.]



Reference location of cross-section above



Coastal Plain (2006) Cross-Sections GS-GS' from USGS Professional Paper 1731.

# **ATTACHMENT 3**

## **DRAFT FACT SHEET**

### **MITIGATION PLAN**

## **MITIGATION PLAN**

**DEQ GROUNDWATER WITHDRAWAL PERMIT NO. GW0075700**

**OWNER NAME: Dennis Farm LLC**

**FACILITY NAME: Dennis Farm**

**LOCATION: 25380 Dennis Road, Parksley, Va. 23421**

### **INTRODUCTION**

On 12/14/2017 Dennis Farm LLC submitted a Groundwater Withdrawal Permit Application to the Virginia Department of Environmental Quality (DEQ) to withdraw groundwater. Groundwater withdrawals associated with this permit will be utilized to grow poultry and cooling for same.

The purpose of this Mitigation Plan is to provide existing groundwater users a method to resolve claims that may arise due to the impact of the withdrawal from Dennis Farms LLC well field. Predicted drawdown of water levels due to the withdrawal(s) from the Middle Yorktown aquifer(s) are shown in the attached maps(s).

Modeled impacts, as shown on the attached maps, extend beyond the boundary of the Dennis Farms LLC facility. Due to these findings, Dennis Farm LLC recognizes that there will be a rebuttable presumption that water level declines that cause adverse impacts to existing groundwater users within the area of impact are due to this withdrawal. Claims may be made by groundwater users outside this area; however, there is a rebuttable presumption that Dennis Farm LLC /Dennis Farms has not caused the adverse impact. Dennis Farm LLC proposes this plan to mitigate impacts to existing users and excludes impacts to wells constructed after the effective date of this permit.

### **CLAIMANT REQUIREMENTS**

To initiate a claim, the claimant must provide written notification of the claim to the following address:

|                      |                             |
|----------------------|-----------------------------|
| Contact Name         | <u>Iqbal Mohammad</u>       |
| Title                | Owner                       |
| Permittee Name       | <u>Dennis Farm LLC</u>      |
| Address              | <u>4629 Nassawango Road</u> |
| City, State Zip Code | <u>Snow Hill, Md. 21863</u> |

The claim must include the following information: (a) a deed or other available evidence that the claimant is the owner of the well and the well was constructed and operated prior to the effective date of the permit; (b) all available information related to well construction, water levels, historic yield, water quality, and the exact location of the well sufficient to allow Dennis Farm LLC to locate the well on the claimant's property; (c) the reasons the claimant believes that the Dennis Farms LLC withdrawal has caused an adverse impact on the claimants well(s).

## **CLAIM RESOLUTION**

Dennis Farm LLC will review any claim within **five (5) business days**. If Dennis Farm LLC determines that no rebuttal will be made and accepts the claim as valid, Dennis Farm LLC will so notify the claimant and will implement mitigation within **thirty (30) business days**. If the claim is not accepted as valid, Dennis Farm LLC will notify the claimant that (a) the claim is denied **or** (b) that additional documentation from the claimant is required in order to evaluate the claim. Within **fifteen (15) business days** of receiving additional documentation from the claimant, Dennis Farm LLC will notify the claimant (a) that Dennis Farm LLC agrees to mitigate adverse impacts or (b) the claim is denied. If the claim is denied, the claimant will be notified that the claimant may request the claim be evaluated by a three (3) member committee. This committee will consist of one (1) representative selected by Dennis Farm LLC, one (1) representative selected by the claimant, and one (1) representative mutually agreed upon by the claimant and Dennis Farm LLC

Any claimant requesting that a claim be evaluated by the committee should provide the name and address of their representative to Dennis Farm LLC. Within **five (5) business days** of receipt of such notification, Dennis Farm LLC will notify the claimant and claimant's representative of the identity of Dennis Farm LLC representative and instruct the representatives to select a third representative within **ten (10) business days**. Representatives should be a professional engineer or hydrogeologist with experience in the field of groundwater hydrology. Dennis Farm LLC agrees to reimburse the members of the committee for reasonable time spent, at a rate prevailing in the area for experts in the above listed fields, and for direct costs incurred in administering the plan. The claimant may, at his or her option, choose to provide the reimbursement for the member of the committee selected by the claimant and up to half of the reimbursement for the mutual representative.

Within **ten (10) business days** of selection of the third representative, the committee will establish a **reasonable deadline** for submission of all documentation it needs to evaluate the claim. Both the claimant and Dennis Farm LLC will abide by this deadline.

Within **fifteen (15) business days** of receipt of documentation, the committee will evaluate the claim and reach a decision by majority vote. The committee will notify the claimant regarding its decision to (a) deny or (b) approve the claim. If the claim is approved, Dennis Farm LLC will mitigate the adverse impacts within **thirty (30) business days** of making the decision or as soon as practical. If the claim is denied by the committee, Dennis Farm LLC may seek reimbursement from the claimant for the claimant's committee representative and one half

of the 3<sup>rd</sup> representative on the committee.

If a claimant within the indicated area of impact indicates that they are out of water, Dennis Farm LLC will accept the responsibility of providing water for human consumptive needs within **seventy-two (72) hours** and to cover the claim review period. Dennis Farm LLC reserves the right to recover the cost of such emergency supply if the claim is denied by Dennis Farm LLC or found to be fraudulent or frivolous. If Dennis Farm LLC denies a claim and the claimant elects to proceed with the three (3) member committee, Dennis Farm LLC will continue the emergency water supply at the claimants request during the committee's deliberations, but reserves the right to recover the total costs of emergency water supply in the case that the committee upholds the denial of the claim. Similarly, Dennis Farm LLC reserves the right to recover costs associated with the claim process if a claim is found to be fraudulent or frivolous.

If it is determined by the committee or shown to the committee's satisfaction that a well operating under a mitigation plan similar to Dennis Farm LLC Plan other than those owned and operated by Dennis Farm LLC has contributed to the claimed adverse impact, Dennis Farm LLC share of the costs associated with mitigation will be allocated in proportion to its share of the impact. Such a determination shall be made by the committee after notification of the third party well owner, giving the third party well owner opportunity to participate in the proceedings of the committee.

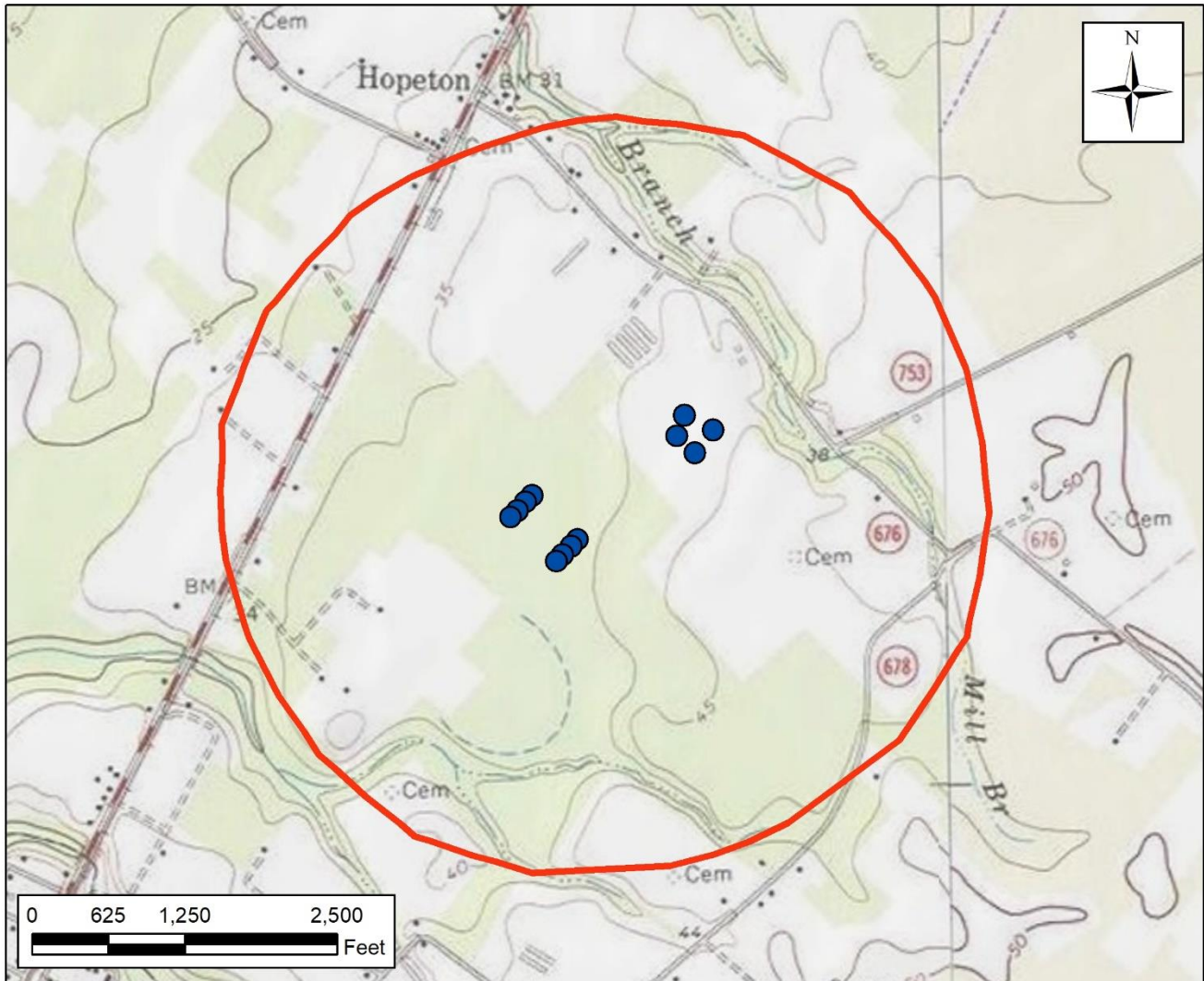
## **PLAN ADMINISTRATION**

Nothing in the Plan shall be construed to prevent the Department of Environmental Quality Staff from providing information needed for resolution of claims by the committee.



# Dennis Farm

## Area of Impact - Middle Yorktown-Eastover Aquifer



● Dennis Farm Wells

○ Middle Yorktown-Eastover Aquifer Area of Impact

Simulated drawdown at or exceeding one foot in the Middle Yorktown-Eastover aquifer resulting from a 16,800,000 gallons per year (46,027 average gpd), 50 year, Middle Yorktown-Eastover withdrawal using the VAHydroGW-ES.

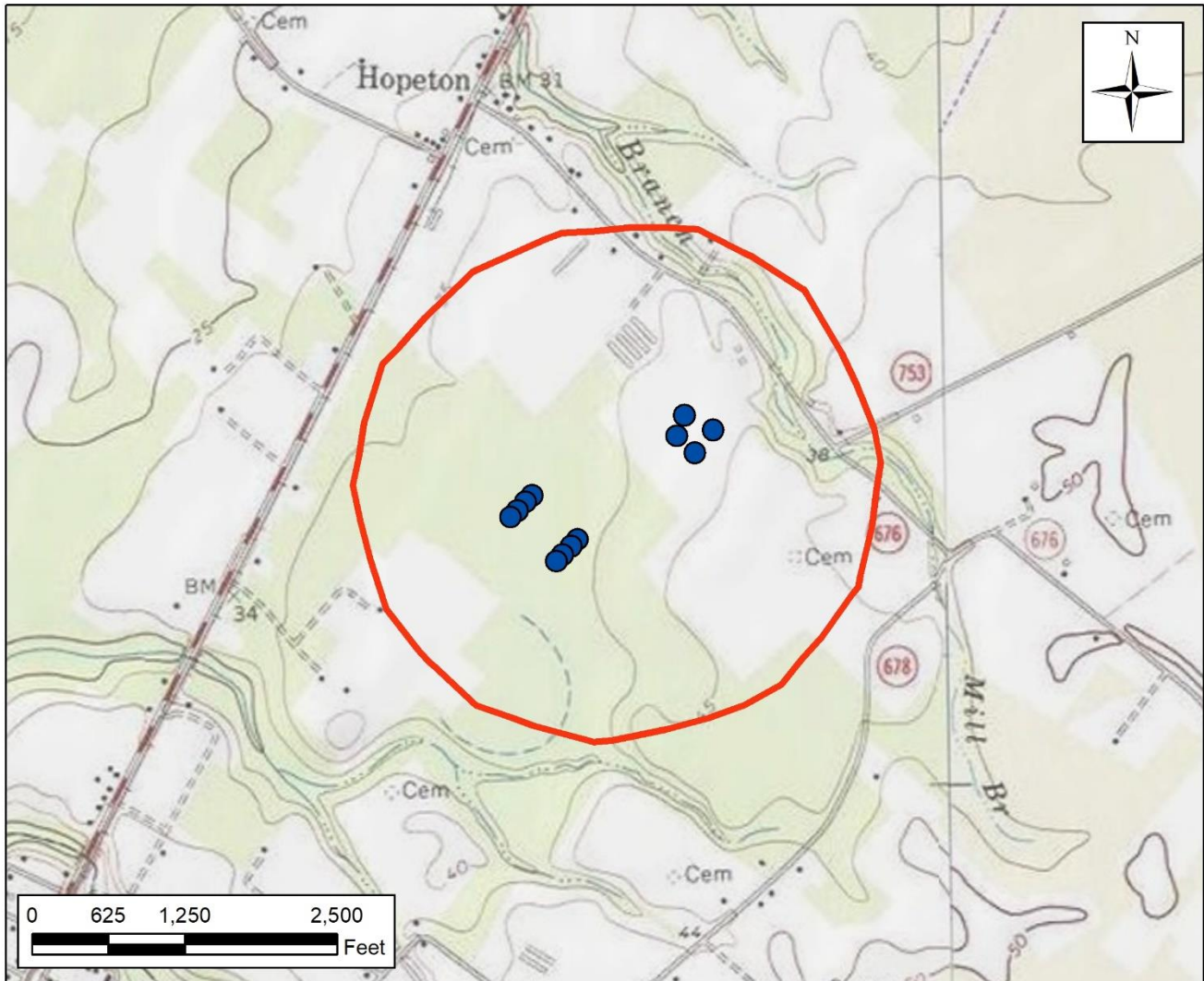
Maximum radius of one foot drawdown (Area of Influence) extends approximately 0.6 miles from the pumping center.

Technical evaluation performed by Aquaveo, LLC for the Virginia DEQ, Office of Water Supply  
December 14, 2018



# Dennis Farm

## Area of Impact - Lower Yorktown-Eastover Aquifer



● Dennis Farm Wells

○ Lower Yorktown-Eastover Aquifer Area of Impact

Simulated drawdown at or exceeding one foot in the Lower Yorktown-Eastover aquifer resulting from a 16,800,000 gallons per year (46,027 average gpd), 50 year, Middle Yorktown-Eastover withdrawal using the VAHydroGW-ES.

Maximum radius of one foot drawdown (Area of Influence) extends approximately 0.4 miles from the pumping center.

Technical evaluation performed by Aquaveo, LLC for the Virginia DEQ, Office of Water Supply  
December 14, 2018



# **ATTACHMENT 4**

## **DRAFT FACT SHEET**

### **WATER CONSERVATION PLAN**

# **Dennis Farms LLC Water Conservation Management Plan**

4/27/2018

**Permit #:GW0075700**

**Facility Site Address 25380 Dennis Road, Parksley, Va 23421**

**Mailing Address (if different): 4629 Nassawango Road, Snow Hill, Md 21863**

**Owner: Iqbal Mohammad**

**Site Contact: Iqbal Mohammed**

**Phone: (757)894.3831**

## **General Overview & System Information**

- Conservation Plans require 24 hour a day Monitoring with the goal of always reducing water flow through the poultry system
- Dennis Farms has 14 poultry house and 12 wells that are in the center row of the most inbound of the houses, All well lines run into the central well house where gauges pressure controls or Switches control the operation of each well. Lines run from the well house to individual houses and either tee off to cooling/consumption or two lines run from each well house to each poultry house control room. Houses 1-6 have four wells that run that 2 wells run three houses each with meters measuring each well consumption and then through manifolds the water in distributed to one of three houses. Each house in front section will house 29,700 birds per flock for a total front farm flock of 178,200. 8 house in the back of the farm house 37,500 birds per flock for a total of 300,000 birds. Total farm flock is 478,200 Cooling is done through 6" recirculating cooling pads with back up foggers in dire emergency. Cooling with Cooling pads and foggers is only used in the last three weeks of production. Cleaning equipment is done from a separate wagon sources pressure tank ( small and use is less than 300 gallons a month)
- Sequence of operation for Tunnel fans, 6" recirculating cooling pads, foggers; Primary Cooling is provided with tunnel fans with set point set and controlled by Bird producer ( Perdue ) set point is 86° ( This number is proportional according to inside temperature and humidity) Cooling pads set point @92° only after the 24<sup>th</sup> day growth cycle, emergency foggers setpoint 102° only on day 36-50 of the growth cycle (maximum fogger operation is 14 days in growth cycle) Cooling is only used in the last three weeks of production. Cleaning equipment is done from a separate wagon sources pressure tank ( small and use is less than 300 gallons a month)
- Modern poultry houses produce no waste water as any waste is caught in the litter and removed at the end of the flock and removed as part of the litter. The only run off in modern houses is storm water house shed water off the roofs into swales that run to a storm water sediment pond
- No Plans for future expansion

## **Section 1: Water Savings Equipment and Processes**

- Cooling and drinking water is routed through automated controls that monitor the flow. With alarms for high flow or usage, cooling water is determined by temp and



air flow, water for consumption is determined by the flock itself. All Water lines inside of each house and through the well house are inspected 3 times in a 24 hour shift and repairs are made immediately. Heat is the main factor in increased cooling and the operator must use as little cooling as possible as this is detrimental to the health of the flock. Interior piping is PVC and inspected 3 times in 24 hours. Transmission lines bringing water to the houses are buried at depths typically 3 feet. All equipment in this farm is state of the art water with conservation in mind.

## **Section 2: Water Loss Reduction Program**

- Walk arounds are done every 8 hour shift with visual inspection and repair of even the smallest leaks before further inspections. Seals, drinkers, hoses and piping is included in this inspection. Inspection is recorded per shift. Grower has industrial repair from vendors on "Just in Time" call. Inspection results are turned over to following shift and day manager will record results immediately.

## **Section 3: Water Use Education Programs**

- All personnel will be trained by equipment manufacturers or their representatives. New equipment proprietary to the industry by our large poultry vendors in the area, magazines and trade professionals.
- Water conservation training shall be given by the owner to all staff at no less than quarterly and upon new hire or transfer from other site. This shall include the importance of conservation through inspection, proper maintenance of all water bearing equipment including meters, valves, connections, recirculating cooling pads and daily site inspection for inside of the poultry house and thorough site inspection, looking for changes to anticipate underground utilities that include water transmission lines. This training shall also include looking back at readings that would indicate a unusual water increase other than flock growth. .

## **Section 4: Evaluation of Potential Water Reuse Options**

- The poultry industry broiler houses cannot use water reuse because of contaminants because of litter.

## **Section 5: Water Use Reductions during Drought or Water Use Emergencies**

- Usage during the four stages of the regional water supply are as follows and actions are listed after each.
- Normal; monitoring of usage with conservation of total with draw numbers always in mind of reduction issues, are our water usage normal in Cooling pads?
- Watch; prepare for 5% reduction by increasing water conservation ie: more frequent inspection of all water bearing devices, more frequent inspection of underground utilities. Contact flock administrators (Perdue) to reduce cooling usage should a drought warning become Monitoring of any onsite alternatives; levels of sediment ponds. Prepare for the drought warning with alternate water sources , prepare water equipment to move water from alternate sources (Ponds).

- Warning; contingency plans discussed in the watch stages would be put into place with targets of reductions to be between 5-10%. Contact should be made with Tyson for Harvest dates or replenishment of next flock for delay.

Emergency; all plans for reduction would be required no longer volunteer. Water conservation should be made constantly through inspection repair and reduction

#### **Section 6: Water Use Restrictions during Drought or Water Use Emergencies**

If the local governing body or the director of the DEQ declares mandatory water use reductions during water shortage emergencies, the owners of Dennis Farms will comply with the water usage restrictions that are imposed

# **ATTACHMENT 5**

## **DRAFT FACT SHEET**

### **PUBLIC COMMENT SHEET**

DRAFT

## SUMMARY OF COMMENTS AND/OR REQUESTS FOR INFORMATION RECEIVED DURING THE PUBLIC COMMENT PERIOD

**Dennis Farm LLC**

## Dennis Farm

**GW0075700**

[illegible]



DRAFT

[illegible]